UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

FEB 07 2014

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

REPLY TO THE ATTENTION OF:

Mr. Steven F. Dodge
President
Stelmi America, Inc.
1601 Brooks Drive
Marshall, Michigan 49068

Re: Notice of Violation
Compliance Evaluation Inspection
EPA ID No.: MI0000888081

Dear Mr. Dodge:

On January 9, 2014, a representative of the U.S. Environmental Protection Agency inspected the Stelmi America, Inc., ("Stelmi") facility located in Marshall, Michigan. The purpose of the inspection was to evaluate Stelmi's compliance with certain provisions of the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. § 6901 *et seq.*, relating to the generation, treatment and storage of hazardous waste. A copy of the inspection report is enclosed for your reference.

Based on the information provided by Stelmi personnel, on a review of records, and on the inspector's personal observations while inspecting the Facility, EPA finds that Stelmi failed to comply with the conditions for an exemption from obtaining a hazardous waste storage facility license. Stelmi was also in violation of certain additional requirements of the Michigan Administrative Code (MAC) and of the U.S. Code of Federal Regulations (CFR).

Stelmi does not qualify for the hazardous waste license exemption

1. In order to avoid the need both for a hazardous waste license and for managing its waste according to MAC R. 299.9306(1) [40 CFR § 262.34(a)], a large quantity generator of hazardous waste in the State of Michigan must, among other things, label satellite accumulation containers with the words "Hazardous Waste" and mark the containers with either the hazardous waste number or chemical name. See, MAC R. 299.9306(2).

   At the time of the inspection, a 55-gallon drum containing chromium-contaminated wastes in the maintenance room was not labeled as specified above. Stelmi, therefore, failed to comply with the above-mentioned condition for a license exemption.

   Note: Mr. Dodge of Stelmi documented in an email dated from 1/13/2014, that the above violation had been corrected on 1/10/2014. No further action is requested for this violation.

2. In order to avoid the need for a hazardous waste license, a large quantity generator of hazardous waste must provide a contingency plan for the facility. This condition for a license exemption is also a requirement of licensed hazardous waste facilities. The contingency plan must include, among other things, the following information:
   - A description of arrangements with local police, fire, hospitals, contractors, state and local emergency responders for emergency services. See, MAC R. 299.9306(1)(d); 40 CFR part 265, subpart D [40 CFR §§ 262.34(a)(4); 265.52(c)]; and
   - A list of all emergency equipment at the facility, which includes the location and a physical description of each item on the list, and a brief outline of its capabilities. See, MAC R. 299.9306(1)(d); 40 CFR part 265, subpart D [40 CFR §§ 262.34(a)(4); 265.52(e)].

   At the time of the inspection, Stelmi had provided a contingency plan for the facility. The plan included a list of emergency equipment which did not include descriptions and capabilities for each item. Also, the plan did not include arrangements that had been attempted or made with the local hospital. Stelmi, therefore, failed to comply with the above-mentioned conditions for a license exemption and violated the above-mentioned hazardous waste facility contingency plan requirements.

   Note: Mr. Dodge of Stelmi documented in an email dated from 1/17/2014, that the above violation had been corrected. No further action is requested for this violation.

3. In order to avoid the need for a hazardous waste license exemption, a large quantity generator of hazardous waste must ensure that facility personnel complete a training program which includes instruction on hazardous waste management procedures (including contingency plan implementation) relevant to the positions in which they are employed. These personnel must take part in an annual review of this training. This condition for a license exemption is also a requirement of licensed hazardous waste facilities. See, MAC R. 299.9306(1)(d); 40 CFR § 265.16 [40 CFR §§ 262.34(a)(4); 265.16(a)(2) and (c)].

   At the time of the inspection, hazardous waste training was being offered to employees on an annual basis. Mr. Hall, however, was identified during the inspection as the emergency coordinator for the site. Mr. Hall did not have a record of having been training in hazardous waste management. Stelmi, therefore, failed to comply with the above-mentioned condition for a license exemption and violated the above-mentioned hazardous waste facility training requirement.

   Note: Mr. Dodge of Stelmi documented in an email dated from 1/17/2014, that the above violation had been corrected. No further action is requested for this violation.

4. In order to avoid the need for a hazardous waste permit, a large quantity generator must, ensure that tanks holding hazardous waste are labeled with the words "Hazardous Waste" See, MAC R. 299.9306(1)(c) [40 CFR § 262.34(a)(3)]. A large quantity generator must also comply with the following requirements, among other things, for tank systems used to store hazardous waste:

- Obtain a written assessment reviewed, and certified by a qualified professional engineer attesting that the tank system has sufficient structural integrity and is acceptable for storing and treating hazardous waste. See MAC R. 299.9306(1)(a)(ii); 40 CFR part 265, subpart J [40 CFR 262.34(a)(1)(ii); 40 CFR § 265.192(a)];

- Use an independent, qualified installation inspector or a qualified Professional Engineer to inspect the new tank system or component in use for (1) weld breaks; (2) punctures; (3) scrapes of protective coating; (4) cracks; (5) corrosion; (6) and other structural damage or inadequate construction or installation. See MAC R. 299.9306(1)(a)(ii); 40 CFR part 265, subpart J [40 CFR 262.34(a)(1)(ii); 40 CFR § 265.192(b)];

- Test the new tanks and ancillary equipment (e.g., piping and pumps used to distribute hazardous waste from its point of generation to a storage or treatment tank) for tightness prior to being covered, enclosed, or placed in use. See MAC R. 299.9306(1)(a)(ii); 40 CFR part 265, subpart J [40 CFR 262.34(a)(1)(ii); 40 CFR § 265.192(d)];

- Ensure that ancillary equipment is supported and protected against physical damage and excessive stress due to settlement, vibration, expansion or contraction. See MAC R. 299.9306(1)(a)(ii); 40 CFR part 265, subpart J [40 CFR 262.34(a)(1)(ii); 40 CFR § 265.192(e)];

- Obtain and keep on file at the facility written statements by those persons required to certify the design of the tank system and supervise the installation of the tank system in accordance with the requirements in 40 CFR § 265.192(b) – (f). See MAC R. 299.9306(1)(a)(ii); 40 CFR part 265, subpart J [40 CFR 262.34(a)(1)(ii); 40 CFR § 265.192(g)];

- Inspect, at least once per operating day, data gathered from leak detection equipment, overfill/spill control equipment, the above-ground portions of the tank system, and the construction materials and the area immediately surrounding the tank system, including the secondary containment system to detect erosion (including cracks and gaps) or signs of releases of hazardous waste. These inspections must be documented in an operating log. See MAC R. 299.9306(1)(a)(ii); 40 CFR part 265, subpart J [40 CFR §§ 262.34(a)(1)(ii); 265.195(a), (b), and (g)].

At the time of the inspection, Stelmi was accumulating hazardous waste sludge generated from their wastewater distillation unit in a 2,000-gallon tank. This tank was not being managed as a hazardous waste tank, and therefore, none of the above requirements were fulfilled. Stelmi, therefore, failed to comply with the above mentioned conditions for a hazardous waste operating license exemption and violated the above-mentioned hazardous waste facility tank requirements.

Note: Mr. Dodge of Stelmi stated in an email dated from 1/13/2014, that the tank subject to this violation was removed from service. EPA requests documentation of completion of closure for this tank as outlined in 40 CFR § 265.197(a) and (b).

Stelmi operated a hazardous waste facility without an operating license

5. A generator of hazardous waste who accumulates hazardous waste on-site for less than 90 days, and who fails to comply with the conditions for a license exemption as noted in items 1 through 4 above, is an operator of a hazardous waste storage facility and is required to obtain a hazardous waste license. See, MAC R. 299.9502(1), 299.9508, and 299.9510 [40 CFR §§ 270.1(c), 270.10(a) and (d)].

   At this time, EPA is not requiring Stelmi to apply for a hazardous waste license so long as Stelmi promptly establishes and/or maintains compliance with the above conditions for a license exemption.

Stelmi violated universal waste requirements

6. Certain wastes may be managed under universal waste standards as an alternative to full regulation as hazardous wastes. Among other requirements, a small quantity handler of universal waste in the State of Michigan must manage used lamps and batteries according to the following:
   - Containers of universal waste lamps shall be marked as "Universal Waste Electric Lamp(s)," "Waste Electric Lamp(s)," or "Used Electric Lamps." See, MAC R. 299.9228(4)(c)(iv); and
   - Containers of universal waste batteries shall be marked as "Universal Waste – Batteries," "Waste Batteries," or "Used Batteries." See, MAC R. 299.9228(4)(a)[40 CFR § 273.14(a)].

   At the time of the inspection, Stelmi was accumulating three boxes of four-foot lamps and one 5-gallon bucket of batteries. One box of lamps and the bucket of batteries were not labeled as specified above. Stelmi, therefore, violated the above-mentioned universal waste requirement.

   Note: Mr. Dodge of Stelmi stated in an email dated from 1/13/2014, that the above violation had been corrected on 1/10/2014. No further action is requested for this violation.

At this time, EPA is not requiring Stelmi to apply for a Michigan hazardous waste license so long as Stelmi provides the information requested in the "*Note*" at the end of item 4, above. Under Section 3008(a) of the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. § 6928, EPA may issue an order assessing a civil penalty for any past or current violation, and requiring compliance immediately or within a specified time period. Although this letter is not such an order, we request that you submit a response in writing to this office no later than thirty (30) days after receipt of this letter documenting the actions, if any, which have been taken since the inspection to establish compliance with the above outstanding requirement.

You should submit your response to Brenda Whitney, U.S. Environmental Protection Agency, Region 5, 77 West Jackson Boulevard, LR-8J, Chicago, Illinois 60604. If you have any questions regarding this letter, please contact Ms. Whitney at (312) 353-4796.

Sincerely,

Gary J. Victorine, Chief
RCRA Branch

Enclosure

cc: Nadine Deak, MDEQ (Deakn@michigan.gov)
Lonnie Lee, MDEQ (Leel@michigan.gov)
John Craig, MDEQ (Craigj@michigan.gov)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, ILLINOIS 60604

Compliance Evaluation Inspection Report

Date of Inspection:	January 9, 2014
Facility Name:	Stelmi America, Inc.
Facility Address:	1601 Brooks Drive Marshall, Michigan 49068
EPA RCRA ID Number:	MI0000888081
Generator Status:	Large Quantity Generator
Facility Contact:	Steven F. Dodge President
U.S. EPA RCRA Inspector:	Brenda Whitney - Environmental Engineer Resource Conservation and Recovery Act Land and Chemicals Division Compliance Section 2
Prepared By:	Brenda Whitney Environmental Engineer
Date Completed:	01/29/2014 Month / Day / Year
Accepted By:	Julie Morris Chief, Compliance Section 2
Date Accepted:	2/3/14 Month / Day / Year

Purpose of Inspection

I conducted an unannounced Compliance Evaluation Inspection (CEI) of Stelmi America, Inc. ("Stelmi" or "Facility") located in Marshall, Michigan on January 9, 2014. This CEI was an evaluation of Stelmi's compliance with the RCRA hazardous waste regulations codified in the Michigan Administrative Code and the Code of Federal Regulations. Stelmi was operating as a large quantity generator. Nadine Deak of the Michigan Department of Environmental Quality (MDEQ) was not able to accompany me on this inspection. The following people were present for part or all of this inspection:

Participants

Steven Dodge President	**Stelmi**
Michael Hall Production Manager	**Stelmi**
Grant Blom Production Control Supervisor	**Stelmi**
Larry Toney Maintenance Manager	**Stelmi**
Brenda Whitney Environmental Engineer	**EPA**

Introduction

I displayed official credentials to Facility personnel upon arrival at Stelmi. The purpose and logistics of the CEI were delineated, and we discussed Stelmi's hazardous waste generation sources and management methods. I informed Mr. Dodge that I would be taking photographs during the CEI as needed. I provided Mr. Dodge with the following compliance assistance documents: *RETAP Brochure (MDEQ)*; *P2 Technical Assistance Contacts; and U.S. EPA Small Business Resources*. After being given an overview of the processes and waste generation at the Facility, I was escorted on a tour of the Facility before returning to the conference room to review records.

Site Description

The following information about Stelmi is based on the personal observations of the EPA inspector and on representations made during the inspection by the Facility personnel identified above or within the text unless otherwise noted.

Stelmi is a privately-owned hard-chromating facility of 24-foot long cylinders of medium carbon steel with diameters ranging from one to five inches. One of the applications for the finished product is hydraulic piston rods for snow plows. Stelmi moved into the 72,000 ft^2 building in 2002. The former occupant was the U.S. Surface Corporation – a manufacturer of vibratory deburring machines. Less than 20 people work at the Facility five days a week.

According to Mr. Dodge, the process at this facility is unique in the United States. The basic steps for the process include grinding and polishing, surface hardening, chrome plating, and finishing. The grinding and polishing stages mechanically smooth the surface of the steel. The polishing stage occurs twice during a run; once prior to plating and again after plating. Surface hardening is done through an electrical process of induction that heats the surface of the bar prior to a water quench. The plating stage is also an electrical process; however, it is done without dipping racks in a series of tanks. This process is a linear system where a bar is inserted into an upper chamber that is flooded with the hex chrome plating solution that is pumped up from a reservoir under the plating chamber. The bar passes through a series of circular anodes and the overflow of plating solution returns via gravity to the bottom storage chamber. The bars are rinsed with water, which is collected in the on-site wastewater treatment system. After rinsing, the bars air dry. This process reduces plating bath losses to the atmosphere and spillage, though it is time intensive and is done is small batches. The finishing process is proprietary and was not discussed during the inspection. Waste generated from this final process has been identified and profiled.

The water and wastewater treatment systems at the facility have several purposes. Incoming city water is first run through a reverse osmosis system in order to remove ionic impurities. This water is used as make-up water in the process for steam losses. The wastewater treatment system is a closed loop system for water reclamation with zero discharge to a sewer. Wastewater is processed through a batch tank. Treatment to separate out usable effluent from contaminants in the tank takes place at a pH of 2.5. The chromium in the batch drops into a sludge at the bottom of the reactor and is pumped out into a sludge tank. This sludge tank feeds a filter press, from which water is removed and sent back to the batch tank for reprocessing. The filter cake is collected in 55-gallon drums and managed as hazardous waste. The usable effluent from the batch tank is siphoned off of the tank into a distillation unit. The water is distilled prior to being placed back into the plating process unit. The bottoms from the distillation unit are pumped to a holding tank, which is pumped out for removal from the site by the hazardous waste vendor, EQ.

Other wastes generated at the site include steel scrap and grinding swarf, which are collected for recycling. From the plating process, solid wastes such as contaminated personal protective equipment or paper towels are managed as hazardous wastes as are plating bath cleanouts and daily bath maintenance wastes. The lead anodes from the plating tanks are cleaned via air-sparging in totes of Anokleen solution, which is discarded as hazardous when spent. Used coolant, which is less than 5% oil, is managed as non-hazardous waste rather than used oil. Used lamps and batteries are managed as universal waste. Forklifts are serviced by outside vendors.

Site Tour

The tour began with the surface grinders. Swarf from this operation is collected in a covered roll-off box outside. The roll-off was labeled as stainless steel scrap, but according to Mr. Dodge, the roll-off is rented and the spray-painted wording came with the container. Coolant in the grinder is pumped for reuse within the equipment several times. When it is spent, it is decanted into a 55-gallon drum and managed as a non-hazardous liquid industrial waste (See Appendix A: Photograph 1).

The maintenance area was next on the tour. In this shop, I observed one 55-gallon satellite drum of chrome-related waste (See Appendix A: Photograph 2). The container was closed but was not labeled. No other wastes were observed in this area.

The polisher and induction hardener equipment are co-located. No waste was observed in this area. After the rods pass through these two stages, they are loaded onto a cart and fed into one of four plating lines depending on the diameter of the rods and the schedule of runs.

The plating machines and wastewater treatment unit are surrounded by a curb, which according to Mr. Dodge is appropriated to contain all of the material in every piece of equipment and container in the area (See Appendix A: Photograph 3). The berm had a few cracks and chips, though the surface of the floor looked intact. The floor had been epoxy coated.

Two 55-gallon drums of hazardous waste were positioned next to plating line 2. One drum contained contaminated solid waste and the second drum contained liquid plating bath wastes. The drums were more than 20 feet apart and were used to collect waste from plating lines 2 and 3. Line 3 was located approximately 50 feet west of plating line 2. The drums were both marked with the words "Hazardous Waste" and marked with hazardous waste numbers. They were also marked with start dates of accumulation, though the facility representatives stated that they were managing these containers as satellites.

Two 300-gallon totes were in their 90-day accumulation area (See Appendix A: Photograph 4). The plastic totes were surrounded by a metal cage that elevated the totes off the floor. The totes were labeled as "Hazardous Waste" and marked with start dates of accumulation from 12/2/13. They were also marked with the following waste codes D002, D004, D005, D006, D007, and D008. These containers held Anokleen waste.

Two 55-gallon drums to the east of plating line 1 were being managed as satellite accumulation containers (See Appendix A: Photograph 5). The drums were approximately 12 feet apart. Both containers were marked as "Hazardous Waste" and were closed. The solids drums was marked with the waste number D007, and the liquid plating bath drum was marked as D002, D006, and D007 and marked with a 12/2/13 start date of accumulation.

Prior to touring the wastewater treatment system, the tour went to the Surface Laboratory. No hazardous waste was observed in this lab. An emergency equipment cart was outside of the laboratory.

The tour continued to the wastewater treatment system. A tank was being used to collect the still bottoms generated from the distillation unit. This tank was not labeled, nor was it managed as a hazardous waste tank (See Appendix A: Photograph 6). I also observed a scrubber system that decants corrosive wastewater into a 300-gallon tote. The tote was not labeled and was not being managed as a 90-day container. The tote takes longer than three days to fill.

En route to the universal waste storage area, I observed one 55-gallon satellite container of hazardous waste on the west side of plating line 4. This container was labeled as "Hazardous Waste," marked with waste codes and was closed.

The universal waste storage area was the last stop on the tour. Three boxes of used lamps were labeled as "Universal Waste" and were closed. One container of used batteries was not labeled.

Records and Emergency Preparedness Review

Preparedness and Prevention: The Facility is equipped with internal communications and alarms systems. Telephones are available for external communications to summon emergency assistance. Portable fire extinguishers and spill control equipment are located throughout the Facility and near the 90-day hazardous waste storage area. Emergency equipment is tested and maintained according to a schedule. Aisle space at the time of the inspection appeared adequate. Arrangements with local emergency responders, except with the hospital, have been made.

Contingency Plan: The contingency plan was last revised on 4/12/13. The emergency coordinators were listed as Michael Hall (primary) and Grant Blom (alternate). Addresses and phone numbers are given. Emergency equipment was listed in the plan with locations, but did not include descriptions or capabilities. An evacuation plan included signals, alternate routes and meeting points in the event of an emergency. Coordination plans with local emergency responders were listed, and the plan had been sent to the LEPC (which encompasses both the fire and police departments) and EQ (contractor). The plan had not been sent to the local hospital.

Training: Training is conducted by EHS Management Strategies, an outside firm. Mr. Blom has been trained on an annual basis, with the most recent three years of training having taken place on 12/16/13, 12/11/12, and 11/1/11. Mr. Hall (the primary emergency coordinator) has not had official RCRA training, though has obtained knowledge of hazardous waste management through on-the-job training. Mr. Steve Thurman, who is a laboratory and production employee, is also trained in RCRA, with his most recent training having been on 12/16/13 as well.

Manifests: Three years of hazardous waste manifests were available for review. Each manifest had a signed copy from the Destination Facility. Land disposal restriction (LDR) forms were also available for review.

Waste Determinations: Waste profiles are documented for each waste generated at the Facility. Most of the determinations are made using both generator knowledge and analyses.

Weekly Inspections: The inspections were documented and were being conducted at least every seven days. The MDEQ form was being used as their template. Mr. Blom conducts the inspections.

Tank Requirements: The tank for distillation bottoms was not being managed as a hazardous waste tank. Applicable records such as a tank assessment and daily inspections were not available for review. The tank was included in the secondary containment liner that covered the production floor. No other requirements had been fulfilled.

Closing Conference

The following items were discussed with Stelmi personnel at the close of the inspection:

- Training records for Mike Hall
- Hazardous waste tank requirements
- Satellite accumulation requirements.
- Confidential Business Information (CBI) was not claimed for any of the information discussed or gathered throughout the inspection.

List of Appendices

- Appendix A: Photograph Log
- Appendix B: Checklists
- Appendix C: Documents received from the Facility during the inspection
- Appendix D: 1. Post-inspection email and photographs from Mr. Dodge dated 1/13/14.
  2. Post-inspection email and photographs from Mr. Dodge dated 1/17/14.
  3. Post-inspection email and photographs from Mr. Dodge dated 1/23/14.

Appendix A

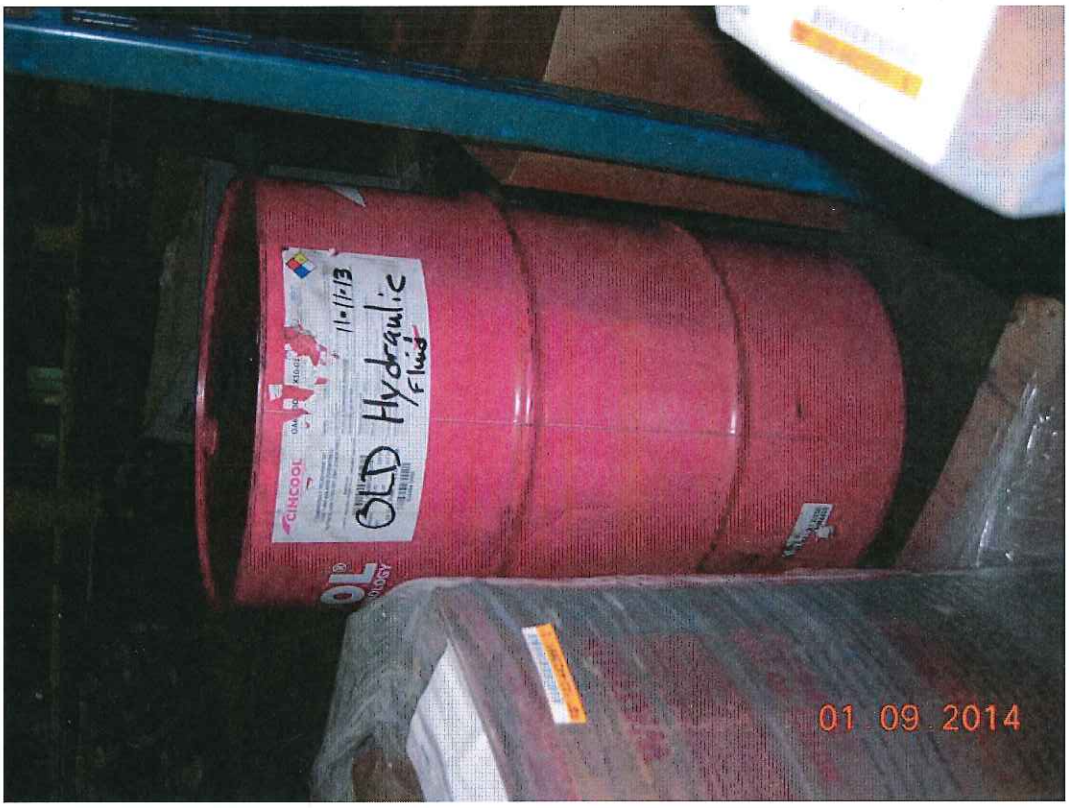
Photograph Log

Inspection Date:
January 9, 2014

Facility Name and ID Number:
Stelmi America, Inc.
EPA ID: MI0000888081

Inspector and Photographer:
Brenda Whitney
Compliance Section 2
RCRA Branch
Land and Chemicals Division

Camera Used:
Nikon Cool Pix P4 VR
Serial Number: 30530701



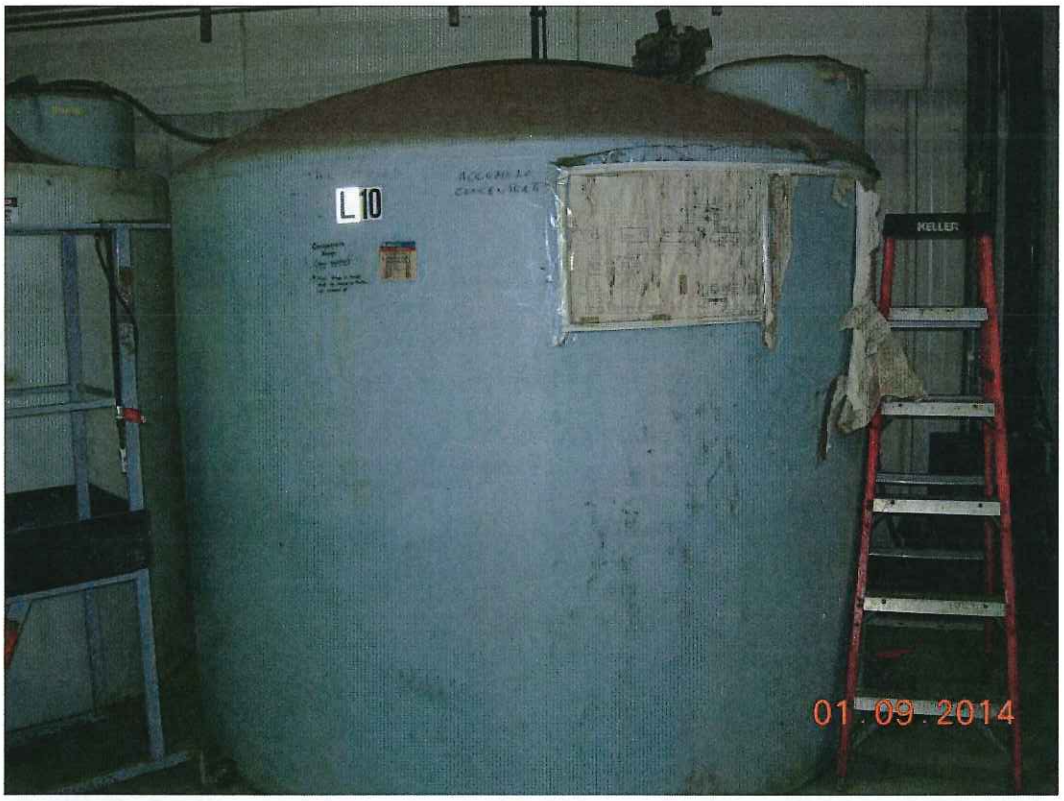
Photograph 1 – This photograph is oriented on its left side. Spent coolant is decanted into a 55-gallon drum and managed as a non-hazardous liquid industrial waste.

Photograph 2 – This photograph is oriented on its right side. A 55-gallon drum in the maintenance shop contained chromium-contaminated waste. The container was not labeled.

Photograph 3 – The plating machines and wastewater treatment system were surrounded by an epoxy-coated curb. The curb had minor chips and cracks in it.

Photograph 4 – Two 330-gallon totes were in the 90-day storage area. Both totes were labeled, dated, and closed.

Photograph 5 – Two 55-gallon drums to the east of plating line 1 were being managed as satellite accumulation container The drums were approximately 12 feet apart. Both containers were marked as "Hazardous Waste" and were closed.



Photograph 6 - A tank was being used to collect the still bottoms generated from the wastewater treatment distillation unit. This tank was not labeled, nor was it managed as a hazardous waste tank

Appendix B

Checklists

Inspection Date:
January 9, 2014

Facility Name and ID Number:
Stelmi America, Inc.
MI0000888081

Department of Environmental Quality
FULLY REGULATED GENERATOR (FRG) INSPECTION FORM

Facility's Name STELMI AMERICA, INC Part 3 Rules

Date 1/9/14 ID# MIØØØØ888081 1994 PA 451

HAZARDOUS WASTE AND WASTE #	SOURCE	HOW MUCH
Still Bottoms	Distillation Unit	> 1000 kg/mo.
Filter cake F006/D007	Filter Press WWTU	
Plating bath Wastes D002/5/6/7/8	Chrome Plating baths	
Anokleen D008/D002/	Anode Cleaning	
Chromium-contaminated solids	Plating baths (PPE)	

___ abbreviated

FACILITY COMPLIANCE REQUIRED IN ALL AREAS

WASTE DETERMINATION (Rule 302: 40 CFR 262.11

(NI = Not inspected; N/A = Not applicable)

		YES	NO	
1. Determined if waste streams are hazardous waste? (Rule 302: 40 CFR 262.11))	262A	[X]	___	NI N/A
a) copy of waste evaluation on-site 3 years? (Rule 307(1): 40 CFR 262.40(c))	262D	[X]	___	NI N/A
b) re-evaluated waste when changes in materials or process? (Rule 302(3))	262A	[X]	___	NI N/A
2. Did generator have written waste analysis plan if treating wastes on-site? (Rule 306)(1)(d):40 CFR 268.7(a)(5))	262C	[X]	___	NI N/A

IDENTIFICATION NUMBER (Rule 303: 40 CFR 262.12)

3. Has the generator obtained an identification number? (Rule 303: 40 CFR 262.12)	262A	[X]	___	NI N/A

MANIFEST REQUIREMENTS (Rule 304: 40 CFR 262.20)

4. Copies of the manifest readily available for review & inspection? (Section 11138(1)(f))	FSS	[X]	___	NI N/A
5. Manifests kept for the past 3 years? (Rule 307(3): 40 CFR 262.20(a))	262D	[X]	___	NI N/A
6. Manifests, prepared by the generator according to instructions in appendix of Part 262 contain the following:				
a) manifest document number (Rule 304(1)(b): 40 CFR 262.20(a)(i)),	262B	[X]	___	NI N/A
b) generator's name, address, phone & ID # (Rule 304(1)(b): 40 CFR 262.20(a)(i)),	262B	[X]	___	NI N/A
c) name & ID # of the transporter. (Rule 304(1)(b): 40 CFR 262.20(a)(i)),	262B	[X]	___	NI N/A
d) name, address & ID # of TSDF. (Rule 304(1)(b): 40 CFR 262.20(a)(i)),	262B	[X]	___	NI N/A
e) DOT description of waste(s). (Rule 304(1)(b): 40 CFR 262.20(a)(i)),	262B	[X]	___	NI N/A
f) quantity of waste, type & # of containers. (Rule 304(1)(b): 40 CFR 262.20(a)(i)),	262B	[X]	___	NI N/A
g) hazardous waste number of the wastes. (Rule 304(1)(b): 40 CFR 262.20(a)(i)),	262B	[X]	___	NI N/A
h) generator signature, initial transporter & date of acceptance. (Rule 304(1)(b): 40 CFR 262.20(a)(i)),	262B	[X]	___	NI N/A
7. **NOT APPLICABLE**				
8. For out-of-state manifests, if not submitted by designated facility, generator submitted copy of 3rd signature manifest as requested by Director? (Rule 304(2)(c))	262B	[ ]	___	NI N/A
9. Is the transporter used properly registered &/or permitted under Act 138, Sec. 2 (3)? (Rule 304(1)(c))	262B	[X]	___	NI N/A

***NOTE**: For shipments of hazardous waste solely by water or rail shipments, within United States see Rule 304(4)(g or h).*

10. Using manifest that has expired? (Rule 304(1)(a) : 40 CFR 262.20)	262B	___	[X]	NI N/A
11. Reportable exceptions (Rule 308(3): 40 CFR 262.42)(a).				
a) number of manifests generator HASN'T receive signed copy from TSD w/in 35 days:				
b) number of manifests generator HASN'T submitted exception reports to RA & DEQ after 45 days:				
12. Facility has written program to reduce volume/toxicity/recycle wastes? (Rule 304(1)(b):40 CFR 262.27(a))	262B	[X]	___	NI N/A

13. Facility discusses program in place to reduce volume/toxicity/recycle of waste (Rule 304(1)(b): 40 CFR 262.27(a))	262B	[ ]	___	NI N/A

LAND DISPOSAL RESTRICTION REQUIREMENTS
WASTE ANALYSIS AND RECORDKEEPING (Rule 311(1): 40 CFR 268.7))

		YES	NO
14. Did the generator determine if the waste is restricted from land disposal? (Rule 311(1): 40 CFR 268.7(a)(1))			
a) all listed waste	**268A**	[X]	___ NI N/A
b) all characteristic wastes?	**268A**	[X]	___ NI N/A

NOTE: *If waste has both listed & characteristic waste codes, the treatment standard for the listed waste is sufficient if the treatment standards for the listed waste includes a standard for the constituent that caused the waste to exhibit the characteristic, except for D001 and D002. (40 CFR 268.9(b))*

15. If restricted waste exceeds treatment standards or prohibitions did notice go w/ initial shipment? (Rule 311(1):40 CFR 268.7(a)(2))	**268A**	[X]	___ NI N/A
OR			
16. If restricted waste does not exceed treatment standards or prohibitions did a notice and certification statement go with initial shipment? (Rule 311(1): (40 CFR 268.7(a)(3))	**268A**	[ ]	___ NI N/A
OR			
17. If waste has exemption from prohibition on the type of land disposal method utilized for the waste, did a notice go with initial shipment? (Rule 311(1): 40 CFR 268.7(a)(4))	**268A**	[ ]	___ NI N/A
OR			
18. If facility choose alternative treatment standard for lab pack that contains none of the waste in appendix IV, did a notice & certification go with initial shipment? (Rule 311(1): 40 CFR 268.7(a)(9))	**268A**	[ ]	___ NI N/A
19. Did the notice include: (Rule 311(1): 40 CFR 268.7(a)(1) or 268.7(a)(2) or 268.7(a)(3)			
a) EPA hazardous waste #?	**268A**	[X]	___ NI N/A
b) if wastewater or non-wastewater as defined in 268.2(d&f)?	**268A**	[X]	___ NI N/A
c) subcategory of the waste (such as D003 reactive cyanide) if applicable?	**268A**	[X]	___ NI N/A
d) manifest number associated with the shipment?	**268A**	[X]	___ NI N/A
e) waste analysis data, where available?	**268A**	[ ]	___ NI N/A
f) waste constituents that the treater will monitor, if monitoring will not include all regulated constituents, for F001- F005, F039, D001, D002, D012-D043? (treatment standards for hazardous waste in table in 268.40 for the waste code under regulated constituents)	**268A**	[X]	___ NI N/A
UNLESS			
g) did generator/treater claim they are going to monitor for ALL regulated constituents in the waste in lieu of the generator indicating same in the notice? (Rule 311(1): 40 CFR 268.7(a)(1) & 268.9)	**268A**	[ ]	___ NI N/A
h) did generator/treater claim they are going to monitor for underlying hazardous waste constituents (except vanadium and zinc), reasonably expected to be present at the generation point, above UTS standards for D001, D002 & TCLP organics? Rule 311(1): 40 CFR 268 Subpart D & 268.48)	**268A**	[X]	___ NI N/A
20. Other than notices for waste exceeding treatment standards, did notices include: (Rule 311(1): 40 CFR 268.7(2)(3)			
a) if the notice is for shipments that meet the standards does the notice include the certification?	**268A**	[ ]	___ NI N/A
b) if the notice is for shipments under prohibitions does the notice include a statement that the waste isn't prohibited from land disposal & date the waste is subject to prohibition?	**268A**	[ ]	___ NI N/A

NOTE: *An alternate treatment standard may be used after approval from the Administrator. (40 CFR 268.44)*
NOTE: *Hazardous waste debris see 40 CFR 268.7(a)(1)(iv) for the notice requirements which must be followed by the statement "This hazardous debris is subject to alternative treatment standards of 40 CFR 268.45."*

21. Generator retain on-site records to support determination from knowledge or results from tests? (40 CFR 268.7(a)(6)	**268A**	[X]	___ NI N/A
22. If the restricted waste is excluded from being a hazardous waste or solid waste did the generator place a one- time notice stating same in the facility file? (40 CFR268.7(a)(7))	**268A**	[ ]	___ NI N/A
23. All notices/certifications/demonstrations/other documents retained for 3 years on-site? (40 CFR 268.7(a)(8)	**268A**	[X]	___ NI N/A

NOTE: *This requirement (268.7(a)(8)) applies to solid waste even when the hazardous waste characteristic is removed prior to disposal or when the waste is excluded from the definition of hazardous waste or solid waste.*

DILUTION PROHIBITED AS SUBSTITUTE FOR TREATMENT (RULE 311(1):40 CFR 268.3)

24. Generator dilute hazardous waste or treatment residue of a hazardous waste to avoid prohibition? (40 CFR: 268.3(a))	**268A**	___	[X] NI N/A

TREATMENT STANDARDS (RULE 311(1):40 CFR 268.40)

25. If wastes exceeding treatment standards are mixed, was the most stringent standards selected? (40 CFR268.40(c))	**268A**	[ ]	___ NI N/A

BIENNIAL REPORT (Rule 308: 40 CFR 262.41)

26. Generator submitted biennial report by 3/1 (even years)? (Rule 308(1): 40 CFR 262.41)	**262D**	[X]	___ NI N/A
27. Were copies of the report retained at least 3 years? (Rule 307(4): 40 CFR 262.40(b))	**262D**	[X]	___ NI N/A

PRE-TRANSPORTER REQUIREMENTS (Rule 305: 40 CFR 262.30)		YES NO
28. Waste packaged according to DOT regulations (required before shipping waste off-site)? (Rule 305(1)(a):40 CFR262.30))	262C	co.said__obsrvd__ [X] ___ NI N/A
29. Are waste packages marked & labeled per DOT 49 CFR172 concerning hazardous materials (required before shipping waste off- site)?(Rule 305(1)(b)(c): 40 CFR 262.32(a))	262C	co.said__obsrvd__ [X] ___ NI N/A
30. On containers of 119 gallons or less, is there a warning, generator's name, address, site identification number, manifest tracking number & waste code per DOT 49 CFR172.304? (Rule 305(1)(d): 40 CFR 262.32(b))	262C	co.said__obsrvd__ [X] ___ NI N/A
31. If required (>1000 #'s), are placards available to the transporter? (Rule 305(1)(e): 40 CFR 262.33)	262C	[X] ___ NI N/A

ACCUMULATION TIME (Rule 306: 40 CFR 262.34)

32. If hazardous waste accumulated in containers: (If no, skip to #35)		
a) containers have accumulation date which is clearly visible? (Rule 306(1)(b): 40 CFR 262.34(a)(2))	262C	[X] ___ NI N/A
b) container have words "Hazardous Waste"? (Rule 306(1)(c): 40 CFR 262.34(a)(3))	262C	[X] ___ NI N/A
c) is each container clearly marked with the hazardous waste number? (Rule 306(1)(b))	262C	[X] ___ NI N/A
d) has more than 90 days elapsed since date marked? (Rule 306(1)	262C	___ [X] NI N/A
OR		
e) one of the following apply:		
i) the generator applied for & received an extension to accumulate longer? (Rule 306(3): 40 CFR 262.34(b))	262C	[ ] ___ NI N/A
ii) it is F006 waste recycled for metals recovery in compliance with Rule 306 (7) (180 days maximum). Rule 306(7):40 CFR 262.34(g))	262C	[ ] ___ NI N/A
iii) it is F006 waste recycled for metals recovery in compliance with Rule 306(7) which must be transported more than 200 miles (270 days max.)? (Rule 306(8):40 CFR 262.34(h)	262C	[ ] ___ NI N/A
iv) generator applied for & received extension or exception to accumulate F006 haz waste longer than ii or iii above? (Rule 306(9-10):40 CFR 262.34(i))	262C	[ ] ___ NI N/A

The following Subpart I, 265.170 to 265.177 requirements are referred to by Rule 306(1)(a) and 40 CFR 262.34(a)(1).

f) are containers in good condition? (265.171)	262C	[X] ___ NI N/A
g) are containers compatible with waste in them (265.172)	262C	[X] ___ NI N/A
h) are containers stored closed? (265.173(a))	262C	[X] ___ NI N/A
i) containers handled/stored in a way which may rupture it or cause leaks? (265.173(b)	262C	___ [X] NI N/A
j) ignitable & reactive wastes stored 15 meters (50 feet) from property line or written approval obtained from local fire prevention code authority for less than 15 meter? (265.176)	262C	[ ] ___ NI N/A
k) are containers inspected weekly for leaks and defects? (265.174)	262C	[X] ___ NI N/A
l) did the generator document the inspections in 32(k)? (Rule 306(1)(a)(i))	262C	[X] ___ NI N/A
m) inspection documents maintained on-site 3 years? (Rule 306(1)(a)(i))	262C	[X] ___ NI N/A
n) are incompatible wastes stored in separate containers? (265.177(a))	262C	[ ] ___ NI N/A
o) hazardous wastes put in unwashed containers that previously held incompatible waste. (265.177(b))	262C	___ [ ] NI N/A
p) incompatible waste separated/protected from each other by physical barriers or sufficient distance? (265.177(c))	262C	[ ] ___ NI N/A

Rule 306(2) & 40 CFR 262.34(c)(1) both refer to 40 CFR 265.171, 265.172 & 265.173(a).

33. If hazardous waste is being accumulated at the point of generation:		
a) container(s) <55 gal or 1 qt acutely/severely toxic? (Rule 306(2):40 CFR 262.34(c)(1))	262C	[X] ___ NI N/A
b) container(s) under operator control & near the point of generation? (Rule 306(2): 40 CFR 262.34(c)(1))	262C	[X] ___ NI N/A
c) container(s) have words "Hazardous Waste"? (Rule 306(2): 40 CFR 262.34(c)(1)(ii))	262C	[X] ___ NI N/A
d) are the container(s) marked with the hazardous waste number or chemical name? (Rule 306(2))	262C	[X] ___ NI N/A
e) are container(s) in good condition? (265.171)	262C	[X] ___ NI N/A
f) are container(s) compatible with waste in them? (265.172)	262C	[X] ___ NI N/A
g) container(s) closed when not in use & managed to prevent leaks? (265.173(a))	262C	[X] ___ NI N/A
34. If generator exceeds 55 gallons or 1 quart, w/in 3 days does generator, w/respect to that amount of excess waste:		
a) mark the container with the date the excess amount began accumulating? (Rule 306(2): 40 CFR 262.34(c)(2))	262C	[X] ___ NI N/A
b) move to an area with secondary containment, if required? (Rule 306(1): 40 CFR 264.175))	262C	[X] ___ NI N/A

Rule 306(1)(a) refers to containment requirements in 40 CFR 264.175.

35. If accumulating free liquids or any F020, F021, F022, F023, F026, F027, does the hazardous waste storage area include		
a) impervious base free of cracks? (264.175(b)(1)) :	262C	[X] ___ NI N/A

b) sloped or otherwise designed to elevate/protect containers from contact with liquids? (264.175(b)(2))		262C	[X] ___ NI N/A
c) hold 10% of volume of containers or volume of the largest container, whichever is greater? (264.175(b)(3))		262C	[X] ___ NI N/A
d) run-on prevented unless sufficient capacity? (264.175(b)(4))		262C	[X] ___ NI N/A
e) accumulated liquids removed in a timely manner to prevent overflow? (264.175(b)5))	NONE	262C	[X] ___ NI N/A

NOTE: *Closure of Accumulation Area covered under # 53.*

36. If accumulating solids, (other than F020,F021,F022, F023, F026, F027), is haz waste accumulation area sloped or otherwise designed, or containers elevated or otherwise protected from contact with liquids? (264.175(c)(1 & 2))		262C	[X] ___ NI N/A
37. Is hazardous waste accumulated in other than tanks or containers? Or, is hazardous waste generated but not accumulated, i.e.: process tank?	*Explain any yes answer.*		___ X NI N/A
38. Waste area protected from weather, fire, physical damage & vandals? (Rule 306(1)(e))		262C	[X] ___ NI N/A
39. Hazardous waste accumulated so no hazardous waste or hazardous waste constituent can escape by gravity into soil, directly or indirectly, into surface, ground-waters, drains or sewers, and such that fugitive emissions do not violate Act 451, Part 55? (Rule 306(1)(f))		262C	[X] ___ NI N/A
40. Is hazardous waste accumulated in tanks?	*If so, complete Tank System inspection form.*		X ___ NI N/A
41. Is hazardous waste placed on drip pads?	*If so, complete Wood Preserving inspection form*		___ X NI N/A

Rule 306(1)(d) & 40 CFR 262.34(a)(4) refers to 265.16
PERSONNEL TRAINING (265.16)

42. Did personnel receive training? (265.16)	Not Mike Hall	262C	[ ] X NI N/A
43. Do personnel training records contain the following:			
a) job title? (265.16(d)(1))		262C	[X] ___ NI N/A
b) job descriptions? (265.16(d)(2))		262C	[X] ___ NI N/A
c) name of employee filling each job? (265.16(d)(1))		262C	[X] ___ NI N/A
d) description of type & amount of both introductory & continued training? 265.16(d)(3))		262C	[X] ___ NI N/A
e) training designed so facility personnel can respond to emergencies? (265.16(a)(3)		262C	[X] ___ NI N/A
f) records of training? (265.16(d)(4))		262C	[X] ___ NI N/A
g) do new personnel receive required training within 6 months? (265.16(b)		262C	[X] ___ NI N/A
h) do training records show personnel have taken part in annual training? (265.16(c))		262C	[X] ___ NI N/A
i) training by person trained in hazardous waste management procedures? (265.16(a))		262C	[X] ___ NI N/A

Rule 306(1)(d) & 40 CFR 262.34(a)(4) refer to 265, Subpart C, 265.30-265.37.
PREPAREDNESS AND PREVENTION (265.30-265.37)

44. Facility maintained/operated to minimize possibility of fire, explosion, release of hazardous waste or hazardous waste constituent which could threaten human health/environment? (265.31)		262C	co.said__obsrvd_ [X] ___ NI N/A
45. If required, does this facility have the following:			
a) internal communications or alarm systems? (265.32(a))		262C	[X] ___ NI N/A
b) telephone or 2-way radios at the scene of operations? (265.32(b))		262C	[X] ___ NI N/A
c) portable fire extinguishers, fire control, spill control equipment and decontamination equipment? (265.32(c))		262C	[X] ___ NI N/A
d) adequate volume of water and/or foam available for fire control? (265.32(d))		262C	[X] ___ NI N/A
46. Testing and Maintenance of Emergency Equipment			
a) owner/operator test & maintain emergency equipment to assure operation? (265.33)		262C	[X] ___ NI N/A
b) has owner/operator provided immediate access to internal alarms? Access to alarm system is applicable **only** if required (40 CFR 265. 32)			
i) when hazardous waste is being poured, mixed, etc. (265.34(a))		262C	[X] ___ NI N/A
ii) if only one employee on the premises while facility is operating. (265.34(b))		262C	[X] ___ NI N/A
c) aisle space for unobstructed movement of personnel/emergency equipment? (265.35)		262C	[X] ___ NI N/A
47. Has the facility made arrangements with local authorities? (265.37(a)&(b))	Hospitals	262C	[ ] ___ NI N/A

Rule 306(1)(d) & 40 CFR 262.34(a)(4) refer to Subpart D, 265.50-265.56.
CONTINGENCY PLAN AND EMERGENCY PROCEDURES (265.50-265.56)

48. Plan implemented whenever fire/explosion/release could threaten human health or the environment? (265.51(b))		262C	[ ] ___ NI N/A
49. Does the contingency plan contain the following:			
a) actions personnel must take responding to fires/explosions/unplanned release of hazardous waste? (265.52(a & b))		262C	[X] ___ NI N/A
b) describe arrangements w/ local police, fire, hospitals, contractors, state & local emergency responders for emergency services; (265.52(c)) & (265.37(a)&(b))?		262C	[ ] X NI N/A

c) name, addresses & phone (office & home) of emergency coordinator? (265.52)(d))	262C	[X]	NI N/A
d) list emergency equipment at the facility, including location, physical description & capabilities? (265.52(e))	262C	[ ] X	NI N/A
e) evacuation plan for personnel w/ signal(s), evacuation routes & alternate evacuation routes. (265.52(f))	262C	[X]	NI N/A
50. Does the facility have an Emergency Coordinator? (265.55)	262C	[X]	NI N/A
Emergency Coordinator and Emergency Procedures:			
a) emergency coordinator familiar with site operation & emergency procedures? (265.55)	262C	[X]	NI N/A
b) emergency coordinator has the authority to carry out the contingency plan? (265.55)	262C	[X]	NI N/A
c) if emergency occurred, did the emergency coordinator follow emergency procedures? (265.56)	262C	[X]	NI N/A
d) fire/explosion/other release of hazardous waste/haz. waste constituents, could threaten human health or environment or generator has knowledge spill reached surface or ground water, did generator notify MDEQ? (Rule 306(1)(d))	262C	[ ]	NI N/A
51. Contingency plan Amendments and Copies			
a) amended: fails in emergency; changes in regulations/emergency coordinators/emergency equipment? (265.54)	262C	[X]	NI N/A
b) copies of plan on site and sent to local emergency organizations? (265.53) hospital	262C	[ ]	NI N/A

Rule 309 refers to 262, Subpart E except 262.54 & 262.55
INTERNATIONAL SHIPMENTS (Rule 309 & 310: 40 CFR 262.50-262.60)

52. Has the facility imported or exported hazardous waste?		X	NI N/A
a) exporting, has the generator:			
i) notified the Administrator in writing <12 months prior to shipment? (Rule 309(1): 40 CFR 262.53(a))	262E	[ ]	NI N/A
ii) receiving country consented to accept waste. (Rule 309(1): 40 CFR 262.52(b))	262E	[ ]	NI N/A
iii) has copy of EPA Acknowledgment of Consent. (Rule 309(1): 40 CFR 262.52(c))	262E	[ ]	NI N/A
iv) complied with manifest requirements in Rule 309(2)(a-h).	262E	[ ]	NI N/A
v) if required, was an exception report filled. (309(3)(a-c))	262E	[ ]	NI N/A
b) importing, has the generator met manifest requirements? (Rule 310: 40 CFR 262.60)	262F	[ ]	NI N/A

Rule 306(1)(g) and 40 CFR 262.34(a)(1) refers to 40 CFR 265.111 & 265.114
ACCUMULATION AREA CLOSURE (265.111 & 265.114)

53. The accumulation area must be closed in a manner that:			
a) minimizes need for further maintenance (Rule 306(1)(g): 40 CFR 265.111(a))	262C	[ ]	NI N/A
b) controls/minimizes/eliminates, to protect human health & environment, the escape of haz. waste or hazardous waste constituents, leachate, run-off to ground/surface waters and air. (Rule 306(1)(g): 40 CFR 265.111(b))	262C	[ ]	NI N/A
c) all contaminated equipment, structures, and soil properly disposed of. (Rule 306(1)(g): 40 CFR 265.114)	262C	[ ]	NI N/A

COMMENTS:

BW - 1/28/14 TANK L10 WAS NOT BEING MANAGED AS HW TANK. NOW OUT OF SERVICE

Department of Environmental Quality
GENERATOR TANK INSPECTION FORM

Facility's Name STELMI AMERICA, INC Part 3 Rules

Date 1/2/14 ID# MI0000888081 1994 PA 451

___ abbreviated

FACILITY COMPLIANCE REQUIRED IN ALL AREAS

ALL TANK SYSTEMS ACCUMULATION TIME (Rule 306: 40 CFR 252.34)

(NI - Not Inspected N/A - Not Applicable)		YES NO
1. Has more than 90 days elapsed since tank was emptied? (If yes, operating license required per Part 5 of Rules. (Rule 306(1): 40 CFR 262.34(a))	GPT	[ ] [X] NI N/A
2. Is each tank labeled or marked with the words "Hazardous Waste" (Rule 306 (1)(c): 40 CFR 252.34(a)(3))	GPT	[ ] [X] NI N/A

***NOTE**: Rule 306(1)(a)(ii) & 40 CFR 252.34(a)(1)(ii) refer to 265 Subpart J, except 265.197(c) and 265.200 & Rule 615, except Subrule (1).*

GENERAL OPERATING REQUIREMENTS (Rule 306: 40 CFR 265.194)

3. Could wastes placed in tank system cause ruptures, leaks, corrosion or other failure? (265.194 (a))	GPT	[ ] [ ] NI N/A
4. Controls & practices to prevent spills & overflows must include: (265.194(b))		
a) spill prevention controls. (265.194(b)(1))	GPT	[ ] [X] NI N/A
b) overfill prevention controls. (265.194(b)(2)).	GPT	[ ] [X] NI N/A
c) freeboard in uncovered tanks to stop overtopping by wave or wind action or precipitation. (265.194 (b)(3)).	GPT	[ ] [ ] NI N/A

***NOTE:** Response to leaks, spills and disposition of leaking or unfit-for-use tank systems is in 40 CFR 265.196.*

5. A tank system or secondary containment system from which there has been a leak, spill or which is unfit for use, is it:		[ ] [ ] NI N/A
a) removed from service immediately? (265.196)	GPT	[ ] [ ] NI N/A
b) completed requirements in 265.196(a-f)	GPT	[ ] [ ] NI N/A

INSPECTIONS (Rule 306(1):40 CFR 265.195)

6. Where present, has the facility inspected at least once each operating day: (265.195(a))		
a) discharge, overflow/spill control equipment (daily). (265.195(a)(1))	GPT	[ ] [X] NI N/A
b) monitoring equipment data (daily). (265.195(a)(3))	GPT	[ ] [ ] NI N/A
c) above ground portion of tank system (daily). (265.195(a)(2))	GPT	[ ] [ ] NI N/A
d) materials and area around tank (daily). (265.195(a)(4))	GPT	[ ] [ ] NI N/A
e) are the inspections documented? (265.195 (c))	GPT	[ ] [ ] NI N/A
7. Must inspect cathodic protection system, if present, for in-ground tanks:		
a) cathodic protection within six months after initial installation (annually thereafter). (265.195 (b) (1))	GPT	[ ] [ ] NI N/A
b) impressed current inspected and/or tested at least bimonthly. (265.195 (b) (2))	GPT	[ ] [ ] NI N/A
c) are the inspections documented? (265.195(c))	GPT	[ ] [ ] NI N/A

SPECIAL REQUIREMENTS FOR IGNITABLE OR REACTIVE WASTE (Rule 306(1):40 CFR 265.198)

8. Ignitable or reactive waste must not be placed in tanks unless:		
a) treated/mixed before or immediately after placed in the tank system, so: (265.198(a)(1))		
i) resulting mixture is no longer ignitable/reactive. (265.198(a)(1)(i))	GPT	[ ] [ ] NI N/A
ii) does not cause environmental or structural damage to tank systems. (265.198(a)(1)(ii))	GPT	[ ] [ ] NI N/A

OR

b) waste stored/treated so protected from igniting or reacting. (265.198(a)(2))	GPT	[ ] [ ] NI N/A

OR

c) tank system is used solely for emergency. (265.198(1)(3))	GPT	[ ] [ ] NI N/A
9. Observes National Fire Protection Association's buffer zone for tanks w/ ignitable or reactive wastes? (265.198(b)) *(See tables 2-1 through 2-6 of NFPA's Flammable & Combustible Liquids Code - 1977" to determine compliance)*	GPT	[ ] [ ] NI N/A

		YES NO
10. Is the tank system designed, constructed, operated and maintained in conformance with requirements of Act 207, Michigan flammable liquid regulations. (Rule 615(4)	GPT	Company said [ ] NI N/A
11. Is the tank labeled in accordance with NFPA standard # 704? (Rule 615(5))	GPT	[ ] NI N/A

INCOMPATIBLE WASTE (Rule 306(1):40 CFR 265.199)

12. Are incompatible wastes stored in separate tanks? (265.199(a)) (If not, the provisions of 265.17(b) apply).	GPT	[ ] NI N/A
13. Tank decontaminated before hazardous waste placed in it that held incompatible waste, unless 265.17(b). (265.199(b)).	GPT	[ ] NI N/A

CLOSURE AND POST-CLOSURE (265.197)

NOTE: *At tank system closure refer to 265.197 for closure/post closure care, except 265.197(c).*

14. If the tank system is closed, did the facility follow the requirements in 265.197? (265.197).	GPT	[ ] NI N/A

EXISTING TANK SYSTEMS
REQUIREMENTS FOR EXISTING TANK(S) CONTAINING LIQUID WASTE THAT DO NOT MEET THE REQUIREMENTS OF 265.193 (Rule 615)

15. Are above ground tanks:		
a) paved, diked or cubed or otherwise enclosed to contain not less than 100% of the largest tank? (Rule 615(2)(a))	GPT	[ ] NI N/A
b) incompatible waste or interconnected tanks must have 100% containment for each tank. (Rule 615(2)(a))	GPT	[ ] NI N/A
16. Do underground tanks:		
a) have secondary containment and a leachate withdrawal system? (Rule 615(2)(b)(i))	GPT	[ ] NI N/A
b) complete an inventory of wastes not less than twice a month? (Rule 615 (2)(b)(ii))	GPT	[ ] NI N/A
c) leachate sampling analysis at least once per year (if b shows loss, sample within 24 hours). (Rule 615(2)(b)(iii)	GPT	[ ] NI N/A

Note: *If existing tanks do not have secondary containment meeting RCRA, the facility must assess the existing tank system's integrity, 265.191.*
Note: *The determination that secondary containment does or does not meet the standards in 265.193 can be made by the company. It does not require a certification by an independent engineer.*
Note: *Tanks w/out free liquids in a building w/ impermeable floor & tanks part of secondary containment system are exempt (265.190(a)&(b).*

ASSESSMENT OF EXISTING TANK SYSTEM'S INTEGRITY (Rule 306(1) :40 CFR 265.191)

17. If existing tank system (before 7/14/86) does not meet the secondary containment requirements in 265.193, was an assessment made and certified by an independent engineer? (265.191)	GPT	[ ] NI N/A

CONTAINMENT AND DETECTION OF RELEASES (Rule 306(1):40 CFR 265.193)

18. Until an existing tank is upgraded to meet the secondary containment requirements in 265.193 has the facility: (265.193(i))		
a) for non-enterable underground tank, performed leak test meeting rqrmnt of 265.191(b)(5) annually: (R 265.193(i)(1))	GPT	[ ] NI N/A
b) for other than non-enterable underground tanks and ancillary equipment, the facility must:		
i) conduct an annual leak test that meets the requirements of 265.191(b)(5). (265.193(i)(2))	GPT	[ ] NI N/A
OR		
ii) an internal inspection or other tank integrity exam by an independent, qualified, reg. prof. engineer. (265.193(i)(2))	GPT	[ ] NI N/A
19. Secondary containment & detection that meets the requirements, must be provided for: (265.193)a))		
a) new tank systems prior to being put into service (any tank installed after 7-14-86). (265.193(a)(1)	GPT	NI N/A
b) existing tanks used for F020, F021, F022, F023, F026, F027 prior to 1/12/90. (265.193(a)(1))	GPT	NI N/A
c) existing tanks w/ documented age before 1/12/90 or tanks 15 years of age, which is later. (265.293(a)(3).	GPT	NI N/A
d) existing tank system, w/out documented age, upgrades done by 1/12/96 unless facility is greater than 7 years in 1988, then containment provided before facility reaches 15 years or by 1/12/90 which is later. (265.193(a)(4))	GPT	NI N/A
e) wastes which became hazardous waste after 1/12/87. (265.193(a)(5))	GPT	NI N/A

NEW TANK SYSTEMS AND UPGRADED EXISTING TANK SYSTEMS
(Rule 306(1):40 CFR 265.193(c))

20. Secondary containment and detection systems must have the following: (265.193(c))		
a) tank system constructed of compatible material with sufficient strength. (265.193(c)(1))	GPT	[ ] NI N/A
b) adequate foundation/base. (265.193(c)(2))	GPT	[ ] NI N/A
c) leak detection system designed/operated to detect leaks w/in 24 hours of earliest practical time. (265.193(c)(3)).	GPT	[ ] NI N/A
d) sloped/drained & all liquid (leaks, precipitation) removed w/in 24 hours or in a timely manner. (265.193 (c)(4)).	GPT	[ ] NI N/A
e) must include one or more of the following:		
i) a liner (external to tanks) & must satisfy the following requirements. (265.193(d)(1))		
A) 100% capacity of largest tank within its boundary. (265.193(1)(i))	GPT	[X] NI N/A

		YES NO
B) prevent run-on or infiltration of precipitation unless excess of capacity. (265.193(e)(1)(ii))	GPT	[ ] ___ NI N/A
C) free of cracks or gaps. (265.193(e)(1)(iii))	GPT	[X] ___ NI N/A
D) cover any area waste may come in contact with if released. (265.193(e)(1)(iv))	GPT	[X] ___ NI N/A

CEMENT LINERS ONLY

***Note**: If liner is cement then, must have, in addition, 265.193(e)(2)(iii & iv)*

ACCORDING TO CONTINGENCY PLAN

E) constructed with chemical resistant water stops in place at all joints. (25.193(e)(2)(iii))	GPT	[X] ___ NI N/A
F) impermeable, compatible interior lining or coating. (265.193(e)(2)(iv))	GPT	[X] ___ NI N/A
ii) vault system & must satisfy the following requirements. (265.193(e)(2)(i-iv))(264.175(b)(3))		
A) 100% capacity of the largest tank within its boundary. (265.193(e)(2)(i))	GPT	[ ] ___ NI N/A
B) prevent run-on or infiltration of precipitation unless excess of capacity. (265.193(e)(2)(ii))	GPT	[ ] ___ NI N/A
C) constructed with chemical resistant water stops in place at all joints. (265.193(e)(2)(iii))	GPT	[ ] ___ NI N/A
D) impermeable, compatible interior lining or coating. (265.193(e)(2)(iv))	GPT	[ ] ___ NI N/A
E) if ignitable or reactive, then provide against vapor formation and ignition. (265.193(e)(2)(v))	GPT	[ ] ___ NI N/A
F) provide with exterior moisture barrier. (265.193(e)(2)(vi))	GPT	[ ] ___ NI N/A
iii) double wall tanks & must satisfy the following requirements: (265.193(d)(3))		
A) designed as integral structure (inner tank with outer shell). (265.193(d)(3)(i))	GPT	[ ] ___ NI N/A
B) protect metal surface for corrosion (interior and exterior). (265.193(e)(3)(ii))	GPT	[ ] ___ NI N/A
C) capable of detecting releases within 24 hours. (265.193(e)(3)(iii))	GPT	[ ] ___ NI N/A
f) ancillary equipment (note certain exclusions) must be provided with full secondary containment. (265.193)(f))	GPT	[X] ___ NI N/A

NEW TANK SYSTEMS
DESIGN AND INSTALLATION OF NEW TANK SYSTEMS OR COMPONENTS (265.192)

21. Facility obtained written assessment that was reviewed & certified (270.11(d)) by independent qualified registered professional engineer to include:		
a) design standards and considerations? (265.192(a)(1)&(5))	GPT	[ ] X NI N/A
b) hazard characteristics of the waste(s) to be handled? (265.192(a)(2))	GPT	[ ] X NI N/A
c) determination by a corrosion expert, (if external shell of metal tank or metal part in contact with soil or water)? (265.192(a)(3))	GPT	[ ] ___ NI N/A
d) if needed, design considerations for UST systems affected by vehicular traffic? (265.192(a)(4))	GPT	[ ] ___ NI N/A
22. New tank/component & piping underground was backfilled w/non-corrosive, porous, homogeneous material & carefully compacted? (265.192(c))	GPT	[ ] ___ NI N/A
23. All new tanks/ancillary equipment tested for tightness before covered, enclosed, put in use? (265.192(d))	GPT	[ ] X NI N/A
24. New tank system not tight, were repairs made before covered, enclosed, put in use? (265.192(d))	GPT	[ ] ___ NI N/A
25. Is ancillary equipment supported/protected against damage & stress? (265.192(e)).	GPT	[ ] ___ NI N/A
26. Corrosion protection provided? (265.192(f))	GPT	[ ] ___ NI N/A
27. Field fabricated corrosion protection supervised by independent expert? (265.192(f))	GPT	[ ] ___ NI N/A
28. Is written statement kept on file at the facility and certified? (265.192(g))	GPT	[ ] X NI N/A

COMMENTS:

Department of Environmental Quality
UNIVERSAL WASTE SMALL QUANTITY HANDLER (SQH) INSPECTION

Facility Name Stelmi America, Inc Part 2 Rules

Date 1/9/14 I.D. # MI0000888081 1994 PA 451

SQH may choose to manage the following as universal waste when they accumulate quantities of 5000 kg (11,000 lbs) or less of all these wastes on site: antifreeze; batteries [except lead acid batteries managed per R 299.9804]; consumer electronics (devices containing circuit boards, liquid crystal display, or plasma display); electric lamps [fluorescent, high intensity discharge (HID), sodium vapor, mercury vapor, neon, metal halide, incandescent lamps, and cathode ray tubes (CRTs) from computers, televisions, etc.]; mercury items: thermostats, mercury switches, mercury thermometers, waste devices containing only elemental mercury; various pesticides; pharmaceuticals.

Yes/No responses that are outside of the parenthesis are violations.

(NI - Not Inspected N/A - Not Applicable)

PROHIBITIONS (Rule 228(4): 40 CFR 273.11)		YES NO
1. Does SQH dispose of universal waste? (Rule 228(4): 40 CFR 273.11(a))	273.B	[ ] [X] NI N/A
2. Does SQH dilute or treat universal waste, except responding to releases or managing certain waste when included below? (Rule 228(4): 40 CFR 273.11(b))	273.B	[ ] [X] NI N/A

WASTE MANAGEMENT (Rule 228(4): 40 CFR 273.13, 273.14)

ANTIFREEZE: (Rule 228(4)		QTY HANDLED:
3. Is antifreeze managed in manner to prevent release by containing it in structurally sound packaging that is compatible w/ contents, & kept closed? Are transport vehicles & vessels managed in the same way? (Rule 228(4)(h))	273.B	[ ] NI N/A
4. Do containers show evidence of leakage, spillage, or damage? If so, are these containers over packed in a container that meets requirements? (Rule 228(4)(h)(ii)(B))	273.B	[ ] NI N/A
5. If tanks are used to store antifreeze, do they meet requirements in 40 CFR 265 Subpart J except 265.197(c), 265.200, & 265.201? (Rule 228(4) (h) (ii) (C). **[USE TANK CHECKLIST]**	273.B	[ ] NI N/A
6. Are containers labeled "UNIVERSAL WASTE ANTIFREEZE" or "WASTE ANTIFREEZE" or "USED ANTIFREEZE"? (Rule 228(4)(h)(iv))	273.B	[ ] NI N/A
7. If a release occurred, was it immediately cleaned up & properly characterized for disposal? (Rule 228(4)(e)(ii))	273.B	[ ] NI N/A

BATTERIES: (Rule 228(4) adopts 40 CFR 273 except 273.10 &273.18(h) requirements)		QTY HANDLED:
8. Are batteries managed in way to prevent releases? (Rule 228(4)(a): 40 CFR 273.13(a)	273.B	[X] NI N/A
9. Are batteries that show evidence of leakage, spillage, or damage that could cause leaks put in containers that are kept closed, structurally sound, compatible w/ contents of battery, & lack evidence of leakage, spillage or damage that could cause leakage? (Rule 228(4): 40 CFR 273.13(a)(1))	273.B	[ ] NI N/A
10. Does the handler do any of the following activities w/ batteries as long as the casings of each battery is not breached & remain intact & closed (except to remove electrolyte): sort by type, mix types in container, discharge to remove electric charge, regenerate, disassemble into individual batteries or cells, remove from consumer products, or remove electrolyte? (Rule 228(4)(a): 40 CFR 273.13(a)(2))	273.B	[ ] NI N/A
11. If electrolyte is removed or other wastes generated from activities in item 10, has it been determined whether it is hazardous waste? (Rule 228(4)(a): 40 CFR 273.13(a)(3))	273.B	[ ] NI N/A
a. If electrolyte or other waste is hazardous waste, is it managed in compliance with Parts 260-272 and Part 111? (Rule 228(4)(a): 40 CFR 273.13(a)(3))	273.B	[ ] NI N/A
b. If electrolyte or other waste is not hazardous waste, is it managed in compliance with Parts 31, 115 or 121 of 451 & local requirements? (Rule 228(4)(a): 40 CFR 273.13(a)(3))	273.B	[ ] NI N/A
12. Are batteries or container(s) of batteries labeled w/ either: "UNIVERSAL WASTE-BATTERIES" or "WASTE BATTERIES" or "USED BATTERIES". (Rule 228(4)(a): 40 CFR 273.14(a))	273.B	[ ] [X] NI N/A

CONSUMER ELECTRONICS: (Rule 228(4)		QTY HANDLED:
13. Are electronics managed in a manner that prevents breakage or the release of any universal waste or components of universal waste by containing electronics in packaging that will prevent breakage during normal handling conditions? (Rule 228(4)(f)(i))	273.B	[ ] NI N/A
14. Is packaging in which the electronics are contained labeled either "UNIVERSAL WASTE CONSUMER ELECTRONICS" or "UNIVERSAL WASTE ELECTRONICS"? (Rule 228(4)(f)(ii))	273.B	[ ] NI N/A
15. Have releases been properly contained, & have residues been characterized, & properly disposed? (Rule 228(4)(f)(iii)	273.B	[ ] NI N/A
16. Does handler do anything beyond any of the following: repair electronics for direct reuse(Rule 228(4)(g)(i); remove other univ. wastes from cons. electronics (Rule 228(4)((g)(ii)); remove modular components for reuse (Rule 228(4)(g)(iii)	273.B	[ ] NI N/A

ELECTRIC LAMPS: (Rule 228(4) ;273.13(c);273.14(d) **QTY HANDLED:** _____

17. Are lamps crushed or broken and facility trying to manage as universal waste? **(universal waste electric lamps shall not be crushed or broken under MI rule)** (Rule 228(4)(c)(i)) ***Note: different from EPA regulation***	273.B	[X] NI N/A
18. Are lamps managed in a manner to prevent breakage or the release of any universal waste or components of universal waste by containing unbroken lamps in structurally sound packaging that is compatible with contents of lamps and will prevent breakage, and packaging kept closed? (Rule 228(4(c)(ii))	273.B	[X] NI N/A
19. Are lamps or packaging containing lamps labeled either "UNIVERSAL WASTE ELECTRIC LAMP(S)" or "WASTE ELECTRIC LAMP(s)" or "USED ELECTRIC LAMP(s)". (Rule 228(4)(c)(iv)) ***Note: different from EPA regulation***	273.B	[X] NI N/A
20. Are lamp fragments or residues, & all lamps that show evidence of breakage, leakage, or damage that could cause release of mercury or other hazardous constituents to the environment immediately contained in packaging that is structurally sound & compatible w/ content, & kept closed? (Rule 228(4)(c)(iii)) ***Note: different from EPA regulation***	273.B	[ ] NI N/A
21. If lamp fragments or residues are generated, has it been determined whether it is hazardous waste? (Rule 228(4)(c)(iii (B)) ***Note: different from EPA regulation which allows broken lamps to continue to be managed as universal waste***	273.B	[ ] NI N/A
a. If waste is characteristic is it managed in compliance w/ Part 111, Act 451: 40 CFR Part 260-272?	273.B	[ ] NI N/A
b. If waste is not characteristic is it managed in compliance w/ Part 115 of Act 451?	273.B	[ ] NI N/A

MERCURY DEVICES: (Rule 228(4) ; 40 CFR 273.13 & 273.14 **QTY HANDLED:** _____

22. Are devices managed to prevent releases? (Rule 228 (4)(d): 40 CFR 273.13(c))	273.B	[ ] NI N/A
23. Are mercury devices that show evidence of leakage, spillage, or damage that could cause leaks placed in a container that is closed, structurally sound, compatible w/ contents of device, & lack evidence of leakage, spillage or damage that could cause leakage, & designed to prevent the escape of mercury by volatilization or other means? (Rule 228 (4)(d): 40 CFR 273.13(c)(1))	273.B	[ ] NI N/A
24. Are mercury devices or containers of mercury devices labeled either "UNIVERSAL WASTE THERMOSTAT(S) " or "WASTE MERCURY THERMOSTAT(S)" or "USED MERCURY THERMOSTAT(S)".(Rule 228 (4)(d): 40 CFR 273.14(d))	273.B	[ ] NI N/A
25. Does handler removing ampules meet the following conditions?		
a. Does facility try to prevent breakage and is doing removal only over a containment device? (Rule 228 (4)(d): 40 CFR 273.13(c)(2)(i & ii))	273.B	[ ] NI N/A
b. Does facility have a clean-up system available to transfer spilled material to another container & use it immediately w/ broken or leaking ampules? (Rule 228 (4)(d): 40 CFR 273.13(c)(2)(iii & iv))	273.B	[ ] NI N/A
c. Is facility area well ventilated & monitored to ensure compliance w/ OSHA exposure limits? (Rule 228 (4)(d): 40 CFR 273.13(c)(2) (v))	273.B	[ ] NI N/A
d. Does facility have employees familiar w/ proper waste handling & emergency procedures? (Rule 228 (4)(d): 40 CFR 273.13(c)(2)(vi))	273.B	[ ] NI N/A
e. Are removed ampules stored in closed, non-leaking container that is in good condition? (Rule 228 (4)(d): 40 CFR 273.13(c)(2)(vi))	273.B	[ ] NI N/A
f. Are removed ampules packed in container with packing material to prevent breakage? (Rule 228 (4)(d): 40 CFR 273.13(c)(2)(vii))	273.B	[ ] NI N/A
26. When devices do not contain ampules & handler removes original housings that hold mercury, does handler immediately seal original housing to prevent mercury release & follow all ampule management requirements? (Rule 228 (4)(d): 40 CFR 273.13(c)(3))	273.B	[ ] NI N/A
27. If waste is generated from removal of ampules or housings, or if clean-up residues are generated, is it determined if it is hazardous waste? (Rule 228 (4)(d): 40 CFR 273.13(c)(3)(i))(A&B), 273.13(c)(4)(i)	273.B	[ ] NI N/A
a. If waste is characteristic, is it managed in compliance w/ part 260-272 and Part 111? (Rule 228 (4)(d): 40 CFR 273.13(c)(4)(ii))	273.B	[ ] NI N/A
b. If waste is not hazardous waste, is it managed in compliance w/ Parts 115 & 121 of Act 451, as applicable? Rule 228 (4)(d): 40 CFR 273.13(c)(4)(iii))	273.B	[ ] NI N/A

PESTICIDES: Rule 228(4) adopts 40 CFR 273 except 273.10 & 273.18(h) **QTY HANDLED:** _____

28. Handler prevents releases by containing pesticides in containers that are closed, structurally sound & compatible w/ pesticide, & does not show evidence of leakage, spillage or damage? (Rule 228(4)(a): 40 CFR 273.13(b)(1))	273.B	[ ] NI N/A
29. If original container is in poor condition, is it over-packed in acceptable container? (Rule 228(4)(a): 40 CFR 273.13(b)(2))	273.B	[ ] NI N/A
30. If stored in tank, are requirements of 40 CFR Part 265, Subpart J met except 265.197(c), 265.200, & 265.201? **[USE TANK CHECKLIST]** (Rule 228(4)(a): 40 CFR 273.13(b)(3))	273.B	[ ] NI N/A
31. If stored in transport vehicle or vessel, is it closed, structurally sound & compatible w/ pesticides & shows no evidence of leakage, spillage or damage?? (Rule 228(4)(a): 40 CFR 273.13(b)(4))	273.B	[ ] NI N/A
32. Are pesticides in a container, tank or transport vehicle labeled either "UNIVERSAL WASTE-PESTICIDE(s)" or "WASTE-PESTICIDE(s)" (Rule 228(4)(a): 40 CFR 273.14(b) **[See 273.14(c) if 273.14(b) not possible]**	273.B	[ ] NI N/A

PHARMACEUTICALS: (Rule 228(4) **QTY HANDLED:** _____

33. Are pharmaceuticals managed in a manner to prevent release of any universal waste or components of universal waste by containing pharmaceuticals in structurally sound packaging that is compatible w/ contents & will prevent breakage, & kept closed? Are containers that do not meet these conditions over packed in a container that does? (Rule 228(4)(e)(i))	273.B	[ ] NI N/A
34. Does handler disassemble packaging & sort pharmaceuticals? (Rule 228(4)(e)(iii))	273.B	[ ] NI N/A

35. Are incompatible pharmaceuticals segregated & adequate distance maintained to prevent contact w/ incompatible materials? (Rule 228(4)(e)(iv)	273.B	[ ] ___ NI N/A
36. If a release occurred, was it immediately cleaned up and properly characterized for disposal? (Rule 228(4) (e) (ii))?	273.B	[ ] ___ NI N/A

ACCUMULATION TIME LIMITS (Rule 228(4): 40 CFR 273.15)

37. Is universal waste accumulated one year or less? (Rule 228(4)(a): 40 CFR 273.15(a)) (if no go to question 38)	273.B	[X] ___ NI N/A
38. If accumulated over one year, is accumulation necessary to facilitate proper recovery, treatment or disposal? (burden on handler to demonstrate) (Rule 228(4)(a): 40 CFR 273.15(b))	273.B	[ ] ___ NI N/A
39. Is length of time universal wastes stored documented by one of the following:		
a. container marked or labeled w/ earliest date when universal waste became a waste? (Rule 228(4)(a): 40 CFR 273.15(c)(1))	273.B	[X] ___ NI N/A
b. individual items of universal waste marked or labeled w/ earliest date it became a waste?? (Rule 228(4)(a): 40 CFR: 273.15(c)(2))	273.B	[ ] ___ NI N/A
c. inventory system maintained on-site that identifies date each item became a universal waste? (Rule 228(4)(a): 40 CFR 273.15(c)(3))	273.B	[ ] ___ NI N/A
d. inventory system maintained on-site that identifies earliest date items in a group or group of containers became a universal waste? (Rule 228(4)(a): 40 CFR (273.15(c)(4))	273.B	[ ] ___ NI N/A
e. universal waste placed in a specific accumulation area & the earliest date is identified when waste was first put in area or date received? (Rule 228(4)(a): 40 CFR (273.15(c)(5))	273.B	[ ] ___ NI N/A
f. any other method when demonstrates length of time universal waste accumulated & date it became a waste or received? (Rule 228(4)(a): 40 CFR (273.15(c)(6))	273.B	[ ] ___ NI N/A

EMPLOYEE TRAINING (Rule 228(4): 40 CFR 273.16)

40. Are employees familiar w/ universal waste handling/emergency procedures, relative to their responsibilities? (Rule 228(4): 40 CFR 273.16))	273.B	[X] ___ NI N/A

RESPONSE TO RELEASE (Rule 228(4): 40 CFR 273.17)

41. Are releases of universal waste & other residue immediately contained? (Rule 228(4): 40 CFR 273.17(a))	273.B	[ ] ___ NI N/A
42. Is material from release characterized? (Rule 228(4): 40 CFR 273.17(b))	273.B	[ ] ___ NI N/A
43. If released material is hazardous waste is it managed as required under Parts 260 – 271 and Part 111? (Rule 228(4): 40 CFR 273.17(b))	273.B	[ ] ___ NI N/A

OFF-SITE SHIPMENTS (Rule 228(4): 40 CFR 273.18

44. Is waste sent to another handler, destination facility or foreign destination? (Rule 228(4)(a): 273.18(a))	273.B	[X] ___ NI N/A
45. If the SQH self-transports waste, does it comply with the universal waste transporter requirements? (Rule 228(4)(b)	273.B	[ ] ___ NI N/A
46. If waste is a USDOT hazardous material, are USDOT requirements met w/regard to package/labels/ marking/placards/shipping papers? (Rule 228(4)(a): 273.18(c))	273.B	[X] ___ NI N/A
47. Prior to shipping universal waste off-site did receiver agree to receive shipment? (Rule 228(4)(a): 40CFR 273.18(d))	273.B	[X] ___ NI N/A
48. If universal waste shipped off-site is rejected by other handler or destination facility, did originating handler either:		
a. receive the waste back? (Rule 228(4)(a): 40 CFR 273.18(e)(1))	273.B	[ ] ___ NI N/A
b. agree to where shipment will be sent? (Rule 228(4)(a): 40 CFR 273.18(e)(2)	273.B	[ ] ___ NI N/A
49. If handler rejects part or full load from another handler, did receiving handler contact originating handler & discuss either:		
a. sending the waste back to originating handler? : (Rule 228(4)(a): 40 CFR 273.18(f)(1)) **OR**	273.B	[ ] ___ NI N/A
b. agreeing to where shipment will be sent? (Rule 228(4)(a): 40 CFR 273.18(f)(2))	273.B	[ ] ___ NI N/A
50. If handler received shipment of hazardous waste that is not universal waste, was the WHMD District Supervisor or designee immediately notified? (Rule 228(4)(a)):40 CFR 273.18(g))	273.B	[ ] ___ NI N/A
51. If handler received a shipment of non-hazardous, non-universal waste, was the waste managed in accordance w/ applicable waste regulations (e.g. solid, liquid industrial, or medical waste)? (Rule 228(4)(a): 40 CFR 273.18(h))	273.B	[ ] ___ NI N/A

EXPORTS (Rule 228(4): 40 CFR 273.20)

52. If waste is sent to a foreign destination does handler:		
a. comply with primary exporter requirements in 40 CFR 262.53, 262.56(a)(1-4 &6) and(b) and 262.57? (Rule 228(4): 40 CFR 273.20(a))	273.B	[ ] ___ NI N/A
b. export with consent of receiving country and in compliance with Acknowledgment of Consent, Subpart E, 40 CFR 262? (Rule 228(4): 40 CFR 273.20(b))	273.B	[ ] ___ NI N/A
c. provide copy of EPA Acknowledgement of Consent to transporter? (Rule 228(4): 40 CFR 273.20(c))	273.B	[ ] ___ NI N/A

TRANSPORTER (Rule 228(6): 40 CFR 273 subpart D except 273.50, 53)

53. Does transporter dispose of universal waste? (Rule 228(6): 40 CFR 273.51(a))	273.D	___ [ ] NI N/A
54. Does transporter dilute or treat universal waste, except if responding to releases? (Rule 228(6): 40 CFR 273.51(b))	273.D	___ [ ] NI N/A
55. If transporting responds to release, do they immediately contain it and characterize residue? If hazardous waste, does transporter meet requirements in 40 CFR 262? (Rule 228(6): 40 CFR 273.54))	273.D	[ ] ___ NI N/A
56. If universal waste stored at transfer facility over 10 days, does transporter meet applicable handler requirements? (Rule 228(6): 40 CFR 273.54))	273.D	[ ] ___ NI N/A
57. Does transporter comply w/ USDOT requirements for package/labels/marking/placards/shipping papers if universal waste is also hazardous material? ***Shipping papers cannot describe universal waste as "hazardous waste, (l) or (s), n.o.s." nor have waste added to USDOT proper shipping name.*** (Rule 228(6)(a): 40 CFR 273.52 and 273.55(b))	273.D	[ ] ___ NI N/A
58. Does transporter meet export conditions contained in 273.56 (dependent on which country will receive shipment)? (Rule 228(6): 40 CFR 273.56)	273.D	[ ] ___ NI N/A
a. has a copy of EPA Acknowledgement of Consent with shipment? (Rule 228(6): 40 CFR 273.56(a)	273.D	[ ] ___ NI N/A
b. delivers shipment to facility designated by person initiating the shipment? (Rule 228(6): 40 CFR 273.56(b))	273.D	[ ] ___ NI N/A

COMMENTS:

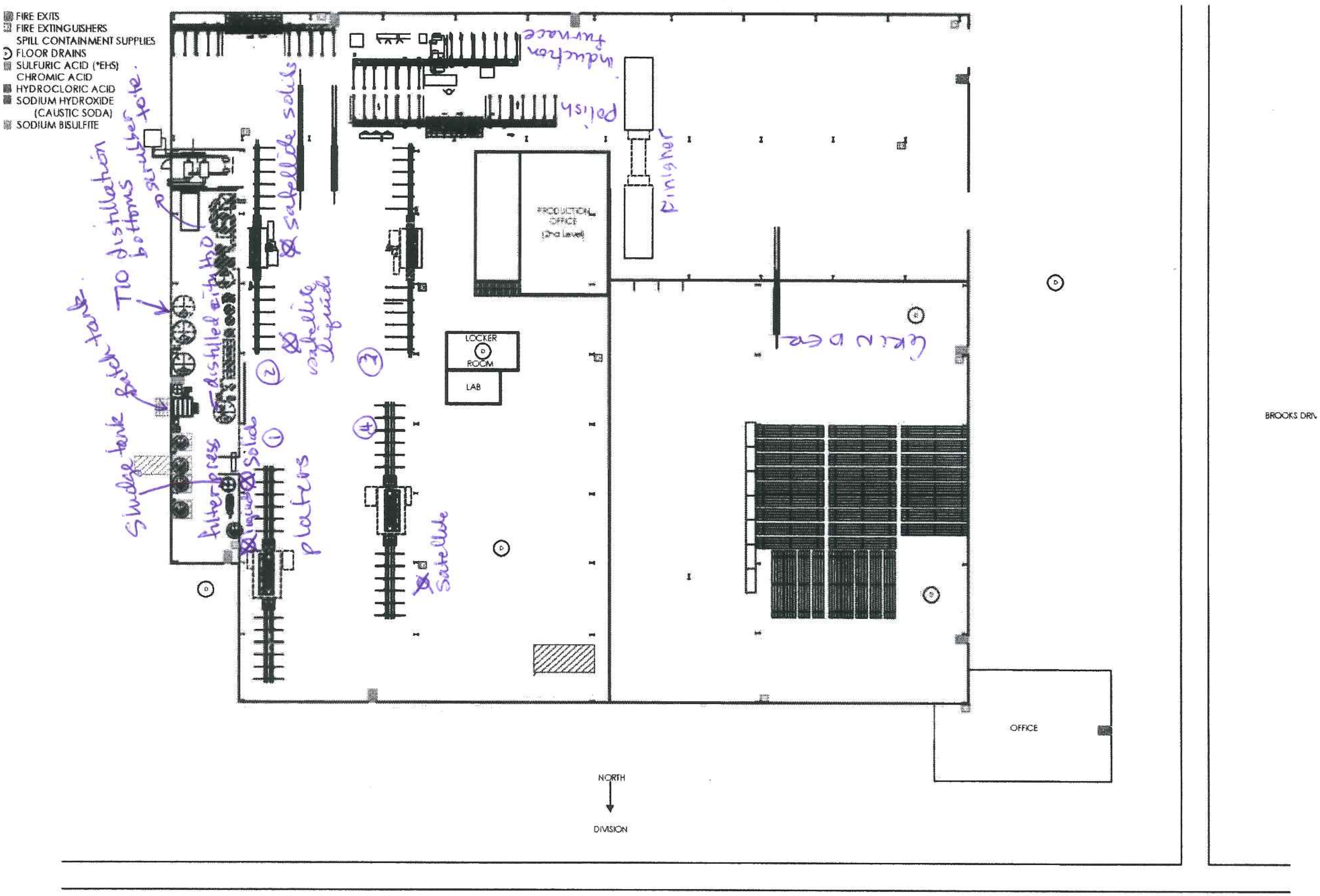
Appendix C

Document received during the Inspection:

- Facility site map

Inspection Date:
January 9, 2014

Facility Name and ID Number:
Stelmi America, Inc.
ID Number: MI0000888081



FIRE EXITS
FIRE EXTINGUISHERS
SPILL CONTAINMENT SUPPLIES
FLOOR DRAINS
SULFURIC ACID (*EHS)
CHROMIC ACID
HYDROCLORIC ACID
SODIUM HYDROXIDE (CAUSTIC SODA)
SODIUM BISULFITE
PRODUCTION OFFICE (2nd Level)
LOCKER ROOM
LAB
OFFICE
NORTH
DIVISION
BROOKS DRIV
induction furnace
polish
finisher
satellite solids
satellite liquid
satellite
platers
filter press
sludge tank
batch tank
T10 distillation bottoms
scrubber tote
distilled eth
solid

Appendix D

Email correspondence from Steven Dodge of Stelmi America, Inc.

Email dates:
1. January 13, 2014
2. January 17, 2014
3. January 23, 2014

Inspection Date:
January 9, 2014

Facility Name and ID Number:
Stelmi America, Inc.
ID Number: MI0000888081

1-13-14 (1)

1601 Brooks Drive
Marshall, Michigan 49068

(269) 781-6222
(269) 781-7723 Fax
www.stelmiamerica.com

Plan of Action & Continuous Improvement from the findings of the 9-Jan-14 EPA Audit

Action Plan Mission: To continuously improve our operating systems by complying with state and federal agencies in regards to protecting the health of humans and the environment.

Objectives and Goals:

1. To review and respond to the findings from the EPA audit conducted on 9-Jan-14 at our facility.
2. Develop an action plan to achieve compliance and room for improvement.

Action Plan:

Action No. 1: Apply hazardous waste label on fifty five gallon drum in maintenance shop. The responsible party will be Grant Blom.

Action No. 1 Status: Completed on 10-Jan-14. Verification photo forwarded to B. Whitney/EPA on 13-Jan-14.

Action No. 2: **Inspect containment berms and repair any areas in need. Responsible party will be Larry Toney.**

Action No. 2 Status: **Inspection of containment berms was conducted on 10-Jan-14. Berm repair areas have been identified. Stelmi will complete repairs by 24-Jan-14. Verification photos to be forwarded to B. Whitney/EPA on 24-Jan-14.**

Action No. 3: **Contact Oaklawn Hospital of Marshall, MI and provide a copy of Stelmi America's, Inc. "Emergency & Contingency Plan". The plan will be modified to highlight the risks that are specific to Stelmi America. The responsible party will be Steve Dodge.**

Action No. 3 Status: **Steve will contact Oaklawn Hospital by 17-Jan-14 and report Oaklawn's response.**

Action No. 4: **Contact EQ Industrial Services and ask if they could put waste names on the LDR's and Approvals. Ask EQ to add waste code D005 (Barium) to our plating bath waste labels. Responsible party will be Grant Blom.**

Action No. 4 Status: **EQ Industrial Services contacted (John Lenard) on 10-Jan-14 and J. Lenard approved our requests. Action No. 4 is completed. Documentation to be forwarded to B. Whitney/EPA on 24-Jan-14.**

Action No. 5: **Detail the PPE (Personal Protection Equipment) and their uses in our "Emergency & Contingency Plan". Note that we only have ABC fire extinguishers. Responsible party will be Steve Dodge.**

Action No. 5 Status: **Will complete by 17-Jan-14 and verification copies to be forwarded to B. Whitney/EPA on 17-Jan-14.**

Action No. 6: **Primary Emergency Coordinator (Michael Hall) to review RCRA Hazardous Waste Management (40 CFR) and DOT Hazardous Materials Transportation (49 CFR) and test.**

Action No. 6 Status: **Will be completed by 17-Jan-14 with test verification forwarded to B. Whitney/EPA on 17-Jan-14 .**

Action No. 7: **Label all universal waste (light bulbs, batteries, etc.). Responsible party will be Grant Blom.**

Action No. 7 Status: **Completed on 10-Jan-14. Verification photo forwarded to B. Whitney/EPA on 13-Jan-14.**

Action No. 8: **Apply a non-hazardous label to fifty five gallon drum of used oil. Responsible party will be Grant Blom.**

Action No. 8 Status: **Completed on 13-Jan-14. Verification photo forwarded to B. Whitney/EPA on 13-Jan-14.**

Action No. 9: **Tank L-10 will be taken out of service permanently. Post out of service sign on 2,000 gallon tank L-10 and replace with a 300 gallon hazardous waste tote labeled and dated. Responsible party will be Grant Blom.**

Action No. 9 Status: **Completed on 13-Jan-14 with verification photos forwarded to B. Whitney/EPA on 13-Jan-14.**

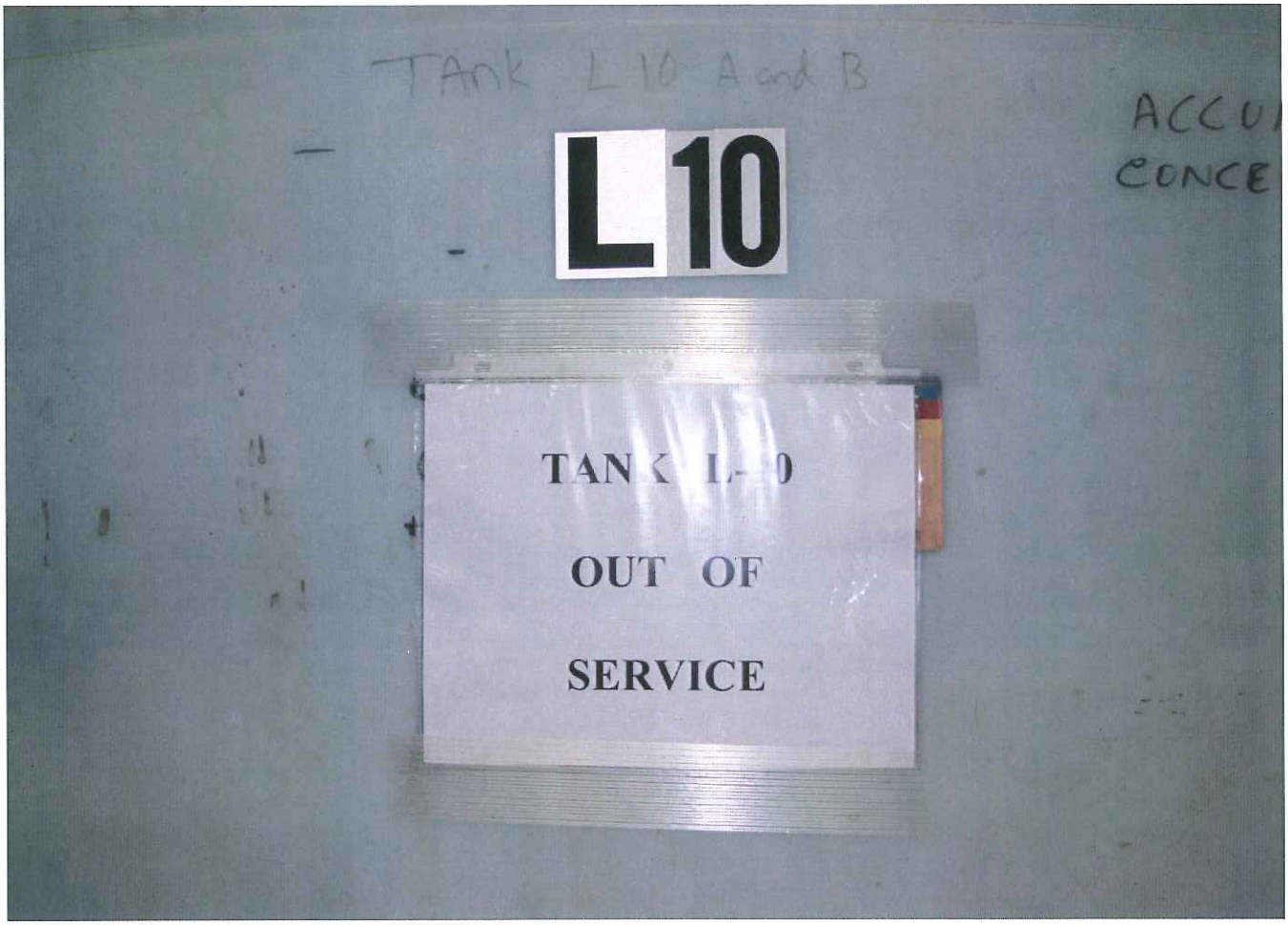
As of 13-Jan-14


HAZARDOUS WASTE
FEDERAL LAW PROHIBITS IMPROPER DISPOSAL
GENERATOR INFORMATION:
STELMI AMERICA, INC
1601 BROOKS DRIVE
MARSHALL
1-9-14
HANDLE WITH CARE!
9


PHILIPS
UNIVERSAL WASTE
UNIVERSAL WASTE
CONTENTS Batteries
ACCUMULATION START DATE 3-26-13
SHIPPER
ADDRESS
CITY, STATE, ZIP
UNIVERSAL WASTE


NON-
HAZARDOUS
WASTE
NON-HAZARDOUS WASTE


SIMPEC
TANK L-10
OUT OF
SERVICE
HAZARDOUS
WASTE
1760
8


TAnk L 10 A and B
L10
TANK L-10
OUT OF
SERVICE

1-17-14 (2)

1601 Brooks Drive
Marshall, Michigan 49068

(269) 781-6222
(269) 781-7723 Fax
www.stelmiamerica.com

Plan of Action & Continuous Improvement from the findings of the 9-Jan-14 EPA Audit

Action Plan Mission: To continuously improve our operating systems by complying with state and federal agencies in regards to protecting the health of humans and the environment.

Objectives and Goals:

1. To review and respond to the findings from the EPA audit conducted on 9-Jan-14 at our facility.
2. Develop an action plan to achieve compliance and room for improvement.

Action Plan:

Action No. 1: Apply hazardous waste label on fifty five gallon drum in maintenance shop. The responsible party will be Grant Blom.

Action No. 1 Status: Completed. Verification photo forwarded to B. Whitney/EPA on 13-Jan-14.

Action No. 2: **Inspect containment berms and repair any areas in need. Responsible party will be Larry Toney.**

Action No. 2 Status: **Inspection of containment berms was conducted on 10-Jan-14. Berm repair areas have been identified. Stelmi will complete repairs by 24-Jan-14. Verification photos to be forwarded to B. Whitney/EPA on 24-Jan-14.**

Action No. 3: **Contact Oaklawn Hospital of Marshall, MI and provide a copy of Stelmi America's, Inc. "Emergency & Contingency Plan". The plan will be modified to highlight the risks that are specific to Stelmi America. The responsible party will be Steve Dodge.**

Action No. 3 Status: **Completed. Plan has been updated and Oaklawn Hospital has been contacted.**

Action No. 4: **Contact EQ Industrial Services and ask if they could put waste names on the LDR's and Approvals. Ask EQ to add waste code D005 (Barium) to our plating bath waste labels. Responsible party will be Grant Blom.**

Action No. 4 Status: **EQ Industrial Services contacted (John Lenard) on 10-Jan-14 and J. Lenard approved our requests. Documentation to be forwarded to B. Whitney/EPA on 24-Jan-14.**

Action No. 5: **Detail the PPE (Personal Protection Equipment) and their uses in our "Emergency & Contingency Plan". Note that we only have ABC fire extinguishers. Responsible party will be Steve Dodge.**

Action No. 5 Status: **Completed. Verification photo of modified document forwarded to B. Whitney/EPA on 17-Jan-14.**

Action No. 6: Primary Emergency Coordinator (Michael Hall) to review RCRA Hazardous Waste Management (40 CFR) and DOT Hazardous Materials Transportation (49 CFR) and test.

Action No. 6 Status: Completed. Test verification and RCRA/DOT training document photos forwarded to B. Whitney/EPA on 17-Jan-14.

Action No. 7: Label all universal waste (light bulbs, batteries, etc.). Responsible party will be Grant Blom.

Action No. 7 Status: Completed. Verification photo forwarded to B. Whitney/EPA on 13-Jan-14.

Action No. 8: Apply a used non-hazardous label to fifty five gallon drum of used oil. Responsible party will be Grant Blom.

Action No. 8 Status: Completed. Verification photo forwarded to B. Whitney/EPA on 13-Jan-14.

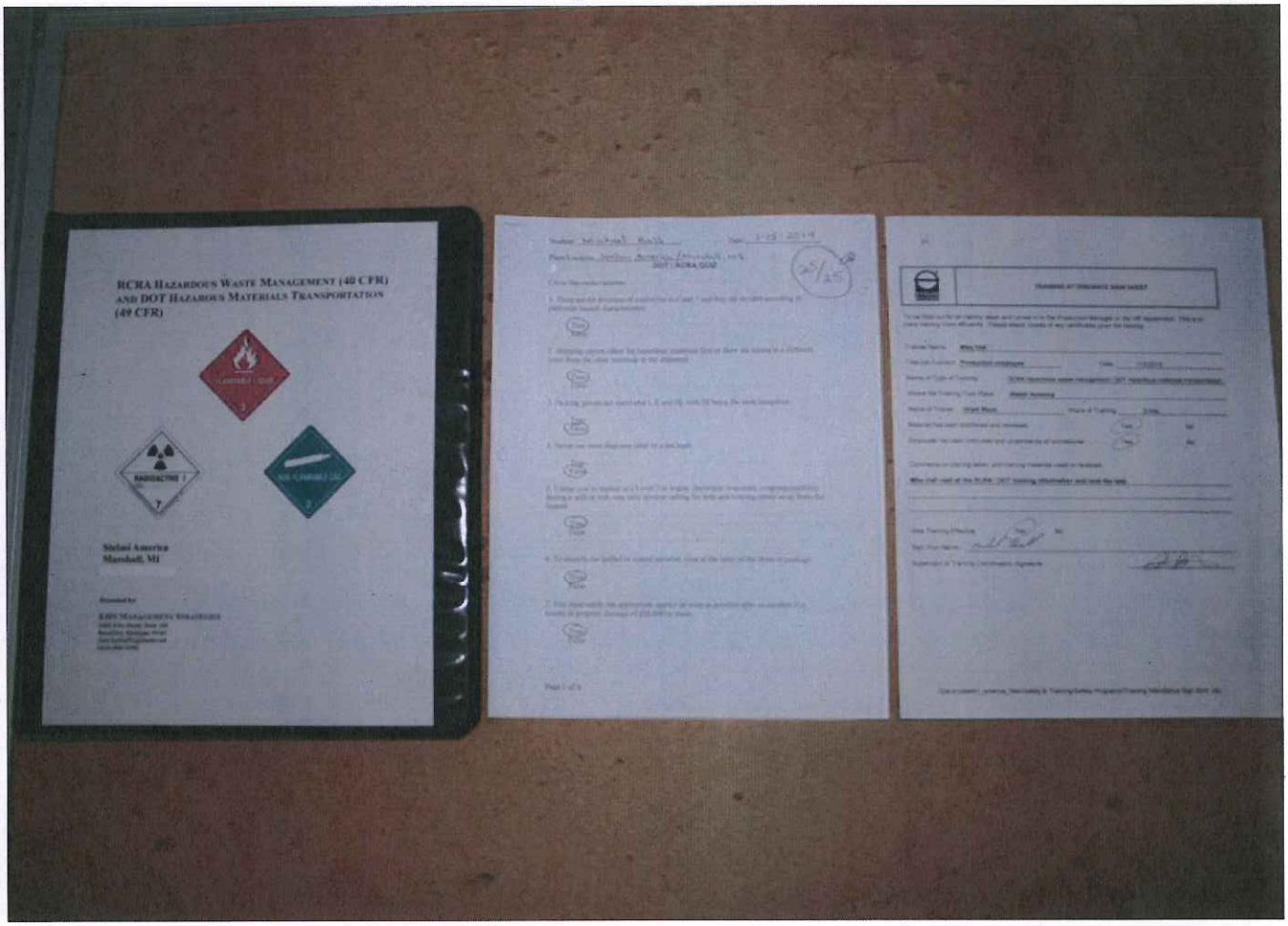
Action No. 9: Tank L-10 will be taken out of service permanently. Post out of service sign on 2,000 gallon tank L-10 and replace with a 300 gallon hazardous waste tote labeled and dated. Responsible party will be Grant Blom.

Action No. 9 Status: Completed. Verification photo forwarded to B. Whitney/EPA on 13-Jan-14.

Action No. 10: Put together a list of chemicals and their MSDS sheets that could have the potential to harm employees and place in a folder by our "Emergency Spill Response Cart". Folder will be given to medical personnel in case of an injury.

Action No. 10 Status: Completed. Verification photo and documentation photo forwarded to B. Whitney/EPA on 17-Jan-14.

As of 17-Jan-14



STELMI AMERICA, INC.

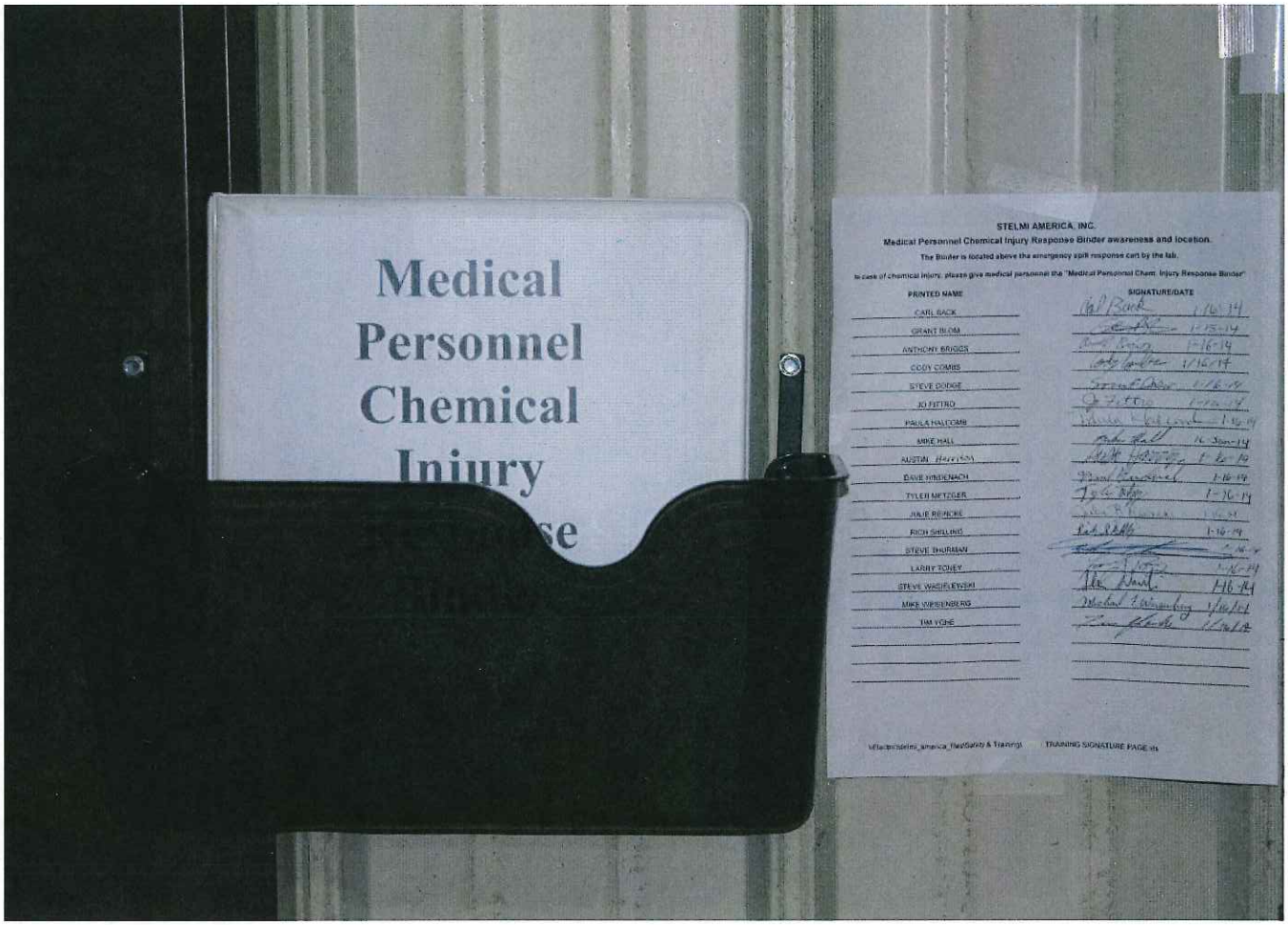
EMERGENCY EQUIPMENT

On-site emergency equipment includes:

1. Plant wide overhead sprinkler system
2. Personal Protection Equipment (Protective Coveralls, Gloves, Masks, Respirators, Helmets)
3. Granular Absorbent
4. Absorbent blankets, pads, and booms
5. Caustic soda (for acid neutralization)
6. Brooms and shovels
7. Wet/dry vacuum (if required)
8. Fire blanket
9. Fire extinguishers (ABC-General Purpose)
10. Water sources are identified and available throughout the plant

All emergency equipment is identified on our site plan.

All emergency equipment will be inspected quarterly as part of Stelmi America's quarterly safety inspection.


Medical
Personnel
Chemical
Injury
STELMI AMERICA, INC.
Medical Personnel Chemical Injury Response Binder awareness and location.
The Binder is located above the emergency spill response cart by the lab.
In case of chemical injury, please give medical personnel the "Medical Personnel Chem. Injury Response Binder"
PRINTED NAME
SIGNATURE/DATE
CARL BACK
GRANT BLOM
ANTHONY BRIDGES
CODY COMBS
STEVE DODGE
JO FITTRO
PAULA HALCOMB
MIKE HALL
AUSTIN HARRISON
DAVE HINDENACH
TYLER METZGER
JULIE RENCHE
RICH SHILLING
STEVE THURMAN
LARRY TOVEY
STEVE WASIELEWSKI
MIKE WIRSENBERG
TIM YOHE
TRAINING SIGNATURE PAGE.xls

1-23-14 (3)

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Action No. 2: Inspect containment berms and repair any areas in need. Responsible party will be Larry Toney.

Action No. 2 Status: Completed. Inspection of containment berms was conducted on 10-Jan-14. Berm repair areas have been patched and repainted. Verification photos forwarded to B. Whitney/EPA on 23-Jan-14.

Action No. 3: Contact Oaklawn Hospital of Marshall, MI and provide a copy of Stelmi America's, Inc. "Emergency & Contingency Plan". The plan will be modified to highlight the risks that are specific to Stelmi America. The responsible party will be Steve Dodge.

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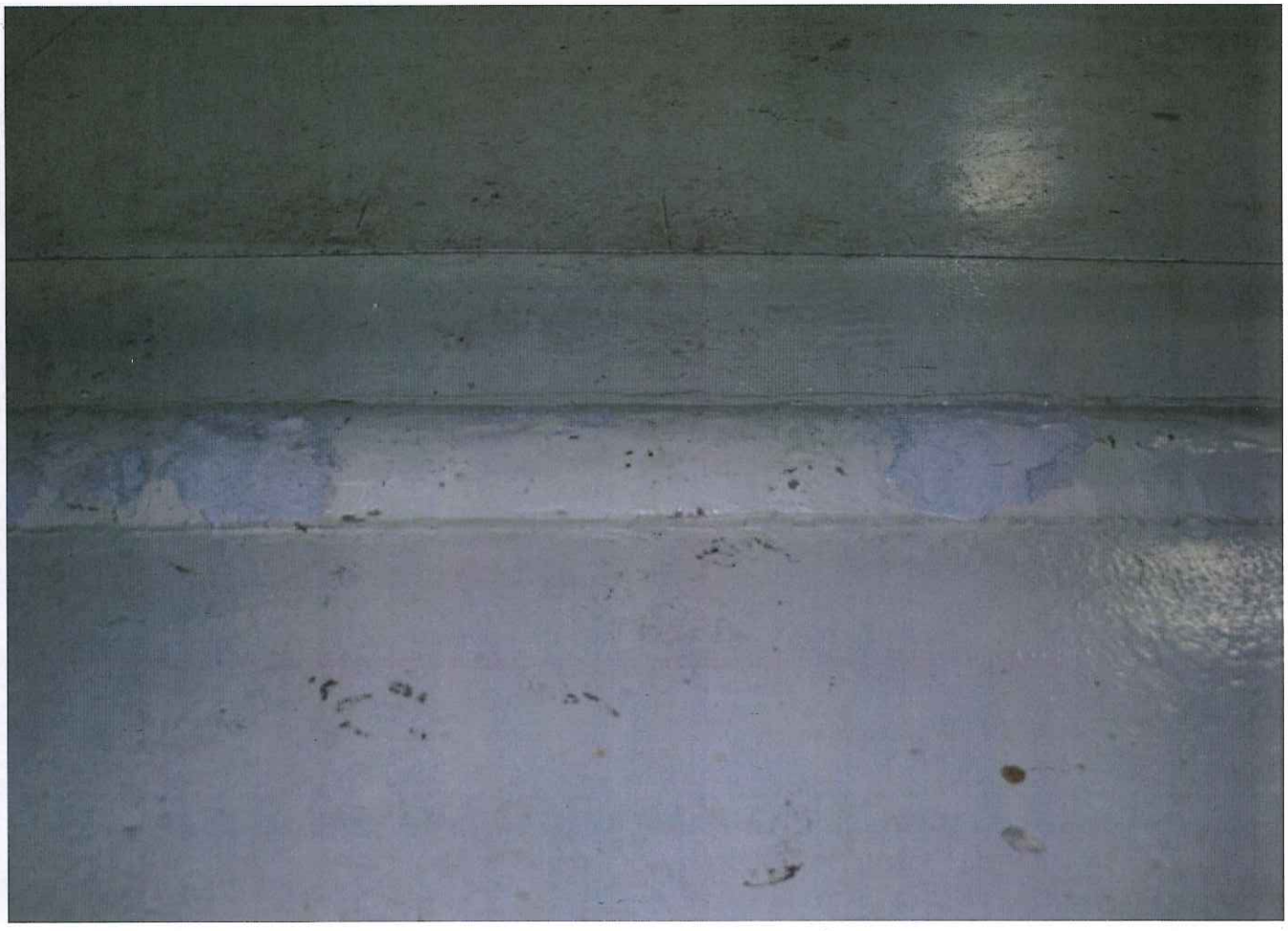
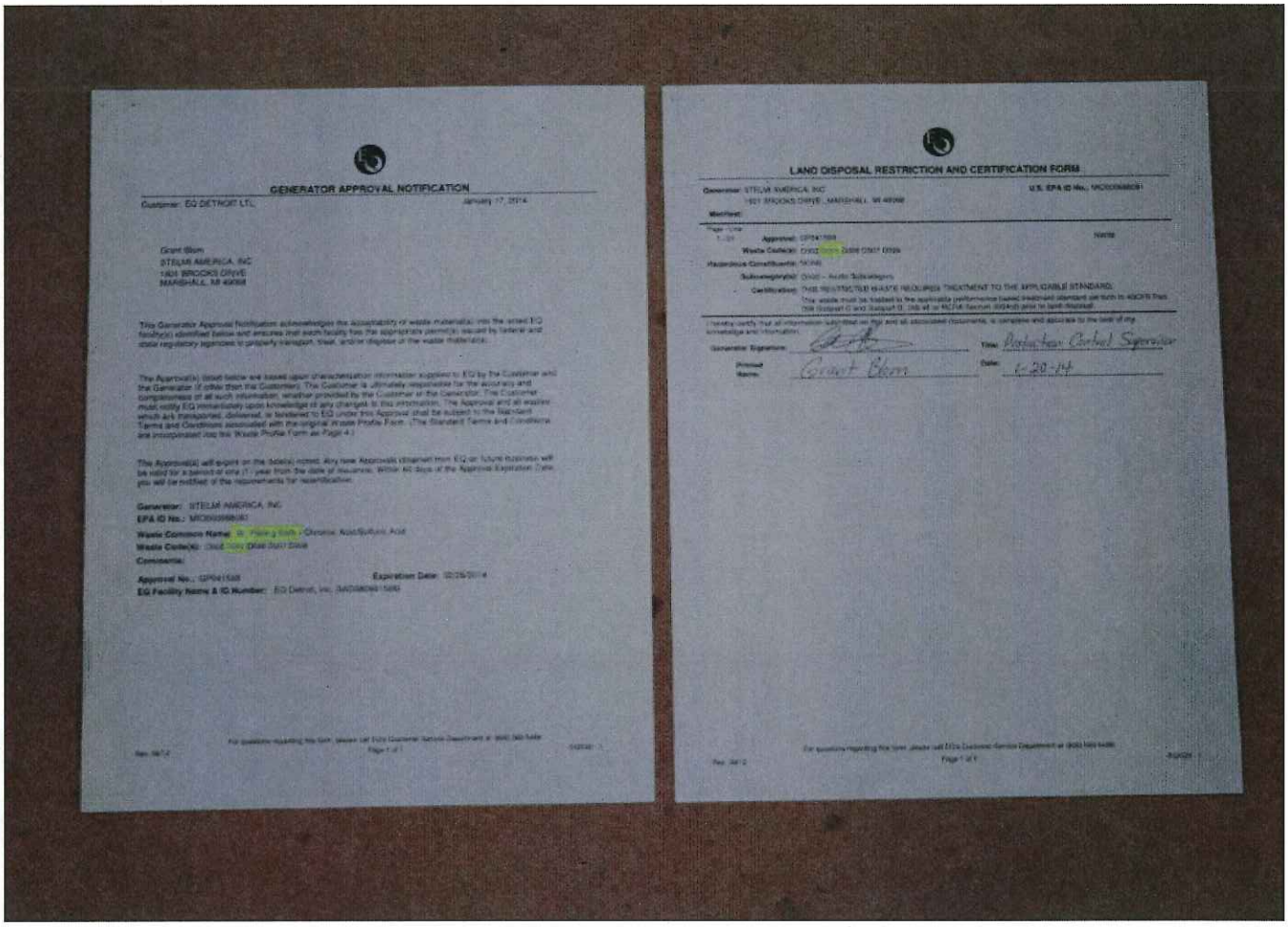




GENERATOR APPROVAL NOTIFICATION

Customer: EQ DETROIT LTL January 17, 2014

Grant Blom
STELMI AMERICA, INC
1401 BROOKS DRIVE
MARSHALL, MI 49068

This Generator Approval Notification acknowledges the acceptability of waste material(s) into the listed EQ facility(s) identified below and ensures that such facility has the appropriate permit(s) required by federal and state regulatory agencies to properly transport, treat, and/or dispose of the waste material(s).

The Approval(s) listed below are based upon characterization information supplied to EQ by the Customer and the Generator (if other than the Customer). The Customer is ultimately responsible for the accuracy and completeness of all such information, whether provided by the Customer or the Generator. The Customer must notify EQ immediately upon knowledge of any changes to this information. The Approval and all wastes which are transported, delivered, or tendered to EQ under this Approval shall be subject to the Standard Terms and Conditions associated with the original Waste Profile Form. (The Standard Terms and Conditions are incorporated into this Waste Profile Form as Page 4.)

The Approval(s) will expire on the date(s) noted. Any new Approvals obtained from EQ on future business will be valid for a period of one (1) year from the date of issuance. Within 60 days of the Approval Expiration Date, you will be notified of the requirements for recertification.

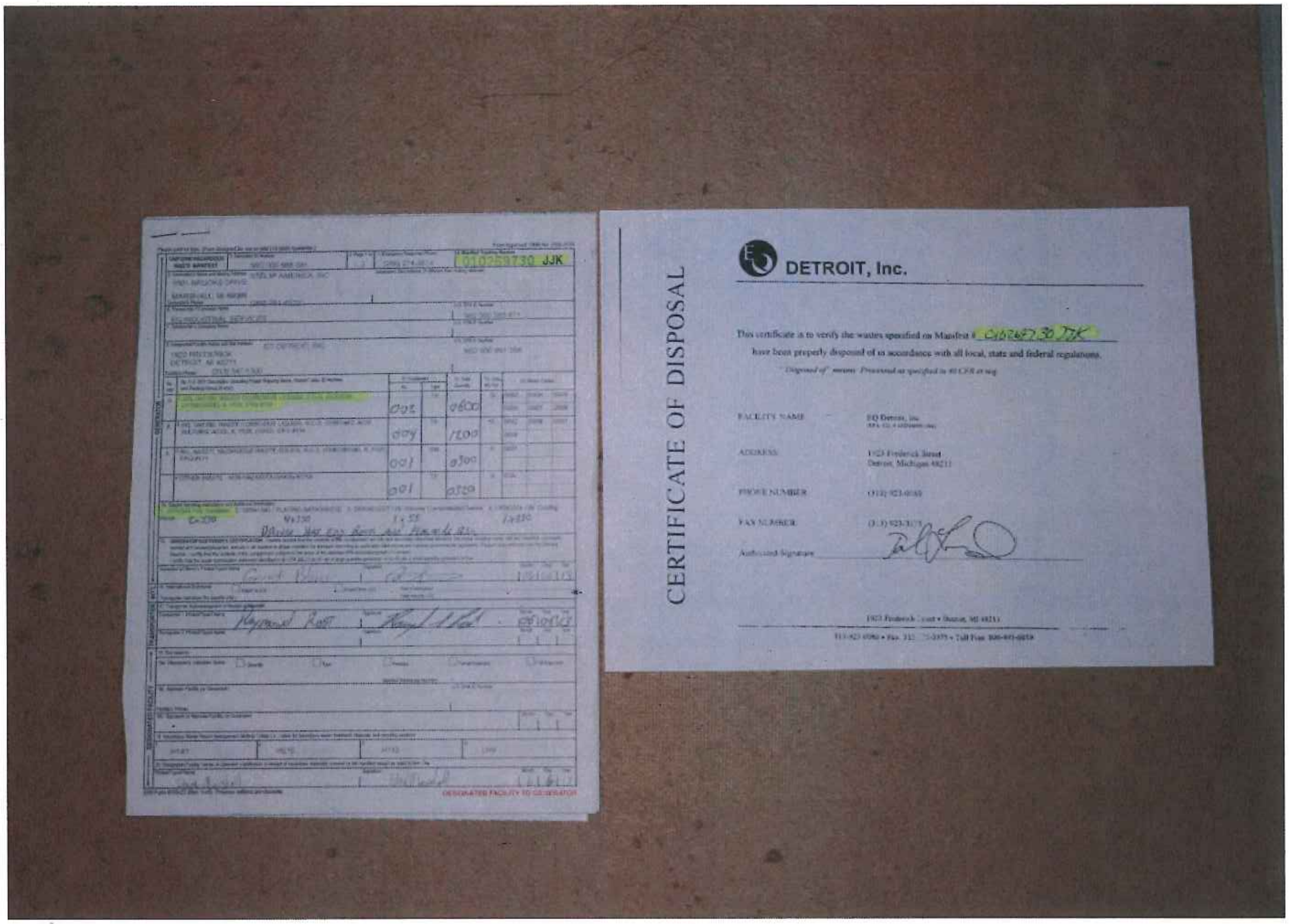
Generator: STELMI AMERICA, INC
EPA ID No.: MIDXXXXXXXXX
Waste Common Name: [illegible] / Chromic Acid/Sulfuric Acid
Waste Code(s): D002 [illegible] D008 D007 D009
Consents:
Approval No.: GP0415XX Expiration Date: 02/25/2014
EQ Facility Name & ID Number: EQ Detroit, Inc. (MID980610XXX)

For questions regarding this form, please call EQ's Customer Service Department at (800) 592-5489
Rev. 04/12 Page 1 of 1 EQDOC

LAND DISPOSAL RESTRICTION AND CERTIFICATION FORM

Generator: STELMI AMERICA, INC U.S. EPA ID No.: MIDXXXXXXXXX
1401 BROOKS DRIVE, MARSHALL, MI 49068
Manifest:
Page 1 of 1 Name
Approval: GP0415XX
Waste Code(s): D002 D003 D006 D007 D009
Hazardous Constituents: Ni, Cr6
Subcategory(s): D002 – Acidic Subcategory
Certification(s): THIS RESTRICTED WASTE REQUIRES TREATMENT TO THE APPLICABLE STANDARD.
This waste must be treated to the applicable performance based treatment standard set forth in 40CFR Part 268 Subpart D and Subpart D, 268.48 or 40CFR Section 268.40 prior to land disposal.
I hereby certify that all information submitted on this and all associated documents, is complete and accurate to the best of my knowledge and information.
Generator Signature: Title: Production Control Supervisor
Printed Name: Grant Blom Date: 1-20-14

For questions regarding this form, please call EQ's Customer Service Department at (800) 592-5489
Rev. 04/12 Page 1 of 1 EQDOC


CERTIFICATE OF DISPOSAL
DETROIT, Inc.
This certificate is to verify the wastes specified on Manifest #
have been properly disposed of in accordance with all local, state and federal regulations.
FACILITY NAME
ADDRESS
PHONE NUMBER
FAX NUMBER
Authorized Signature
DESIGNATED FACILITY TO GENERATOR